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TSD - RCRA INSPECTION REPORT

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION (Interim Status Facility - 329 IAC 3.1-10)
EPA, REGION V

EPA ID # IND 006 417 430 NAME Marathon Oil Company

MAILING ADDRESS: 5000 W. 96th Street

Indianapolis, In. 46228

LOCATION ADDRESS: 5000 W. 96th Street

Indianapolis In. 46228

CONTACT: Pat Sorenson PHONE: 317/872-3200

OWNERSHIP: Marathon Oil Co. COUNTY: Marion

STATUS CODE: 1 1=Active 3=Dead Mail 4=Non-notifier
6=Non-handler 2=Obsolete ID # 9=Superfund site
5=Out-of-business

Person(s) interviewed:	Title:	Telephone:
<u>Pat Sorenson</u>	<u>Env. Co-ordinator</u>	<u>317/872-3200</u>
<u>Lynda Rios</u>	<u>Env. Engineer</u>	<u>317/872-3200</u>
<u>Dan Housenga</u>	<u>Chem. Engineer</u>	<u>317/872-3200</u>

Inspector(s):	Agency:	Telephone:
<u>Mike Penington</u>	<u>IDEM</u>	<u>317/232-4994</u>

Date of inspection: May 21, 1993 Time of inspection: 8:00 AM

The Indiana Hazardous Waste Rules, 329 IAC 3.1, incorporates by reference federal standards which have been published in the Code of Federal Regulations as 40 CFR 260 through 40 CFR 270. Citations contained in this inspection form reference the federal rules as of July 1, 1990, except where the State rule substitutes full text language, in which case the specific 329 IAC 3.1 citation will be used.

Installation Processes by Process Code (EPA Form 3510-3)

S01 <input checked="" type="checkbox"/>	Container storage	T03 <input type="checkbox"/>	Incinerator treatment
S02 <input type="checkbox"/>	Tank storage	T04 <input type="checkbox"/>	Other treatment
S03 <input checked="" type="checkbox"/>	Waste pile storage	D79 <input type="checkbox"/>	Injection well disposal
S04 <input type="checkbox"/>	Surface impoundment storage	D80 <input type="checkbox"/>	Landfill disposal
T01 <input type="checkbox"/>	Tank treatment	D81 <input type="checkbox"/>	Land application disposal
T02 <input type="checkbox"/>	Surface impoundment treatment	D83 <input type="checkbox"/>	Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

Waste pile closure plan approved May 18, 1993. Closure activities to be completed by August 9, 1993 as stated in closure plan.

A. GENERAL INFORMATION

- 1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.
- 3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or nonhazardous)!

* Waste Pile removed closure in progress

- 4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

	<u>YES</u>	<u>NO</u>
a) Waste Oil Fuel	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Hazardous Waste Fuel	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Tanks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Container Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Generator Accumulation	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Waste Pile	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- g) Surface Impoundment
h) Landfill
i) Process Vents
j) Equipment Leaks

YES

NO

LDR
Treatability
Group
(WW/NWW)
NWW

5) Hazardous Waste Streams/EPA #	Source	Rate	Disposition	LDR Treatability Group (WW/NWW)
D001 F003	Paint Waste	2,222 pounds year	Heritage	NWW
K049 → K051 D018	APC Heat Exchanger slop oil	560,000 gal. per year	✓	NWW
K052	Leaded Tank Bottoms		✓	NWW
D008	Parts Washer		✓	NWW
D018	Soil	160 yds.	✓	NWW
				MP MP

YES

NO

NA

- 6) Have both listed and characteristic waste codes been assigned, where a listed waste exhibits a characteristic? 40 CFR 268.9
- 7) Does the facility handle any California List Wastes? (liquid hazardous waste with greater than 50 ppm PCB, greater than 134 ppm nickel, greater than 130 thallium, etc.)
- 8) List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition

9) If the company claims a reuse or reclaim exemption please include the following information:

	<u>Waste Type</u>	<u>Generation Rate</u>	<u>How reclaimed & by Who</u>	<u>Quantity stored on Site</u>
A.				
B.				

10) Hazardous Waste
On-Site

	<u>Amount</u>	<u>How Stored</u>	<u>Comments</u>
K048 → K051	21	55 gal. Drums	
K048 → K051	3	20,000 Gal. Container	
K048 → K051	4	200 bags	
D001 F003 Paint Waste	1/2	55 gal Drum	

11) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred)

(40 CFR 270.13)

(HWIMS 610)

NA

12) Is the Biennial Report Accurate? Yes

13) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.)

None observed

14) Additional Comments:

B. LAND BAN TREATMENT STANDARDS

(HWIMS 700)

OK DF NI NA

- 1) Does generator dilute prohibited wastes to meet treatment standard criteria, or render them nonhazardous, as a substitute for adequate treatment?
40 CFR 268.3 — — — ✓
- 2) Do treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics?
40 CFR 268.9 ✓ — — —
- 3) Does generator specify alternative treatment standards for lab packs or F039 leachate? If yes, see
40 CFR 268.42(c)(2) — — — ✓
- 4) Does generator mix wastes with different treatment standards for a constituent of concern? ✓ — — —
 - a. If yes, did generator select most stringent treatment standards? ✓ — — —
- 5) Does the generator handle any wastes with a LDR variance (national capacity, case-by-case, etc.)? — — — ✓

C. ON-SITE TREATMENT

(HWIMS 700)

- 1) Does the generator treat wastes in 90-day tanks or containers? If NA, go to next section. — — — ✓
- 2) Does the generator treat the wastes to meet appropriate treatment standards? — — — —
 - a. If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted?
40 CFR 268.7(a)(4) — — — —
- 3) Does the plan fulfill the following:
 - a. Based on a detailed chemical and physical analysis of a representative sample — — — —
 - b. Contains information necessary to treat the wastes in accordance with LDR — — — —
- 4) Has the plan been filed with the Regional Administrator or IDEM? — — — —

5) Are characteristic wastes which have been rendered nonhazardous shipped to a solid waste facility?

OK DF NI NA

a. If yes, is a notification and a certification for each shipment sent to the Regional Administrator (prior to 2/24/92) or IDEM?
40 CFR 268.9(d)(1) and 268.7(b)(5)

D. STORAGE

(HWIMS 700)

1) Is the amount of hazardous waste in the storage area(s) equal to or less than the capacity allowed in the Part A? List type and amount of any storage capacity overages? 40 CFR 270.72

— — — ✓

2) Are all containers clearly marked to identify the contents and date(s) entering storage or is such information available in the operating log?
40 CFR 268.50(a)(2)(i)

— — — ✓

3) Have wastes been stored for less than one year?

✓ — — —

a. If no, can the facility show that such storage is necessary to facilitate proper recovery, treatment or disposal. 40 CFR 268.50(c)

— — — ✓

E. TREATMENT

(HWIMS 700)

1) Does the facility treat hazardous waste other than in 90-day tanks and containers? If NA, go to next section.

— — — ✓

2) Are required technologies used to treat wastes which have treatment standards expressed as technologies? 40 CFR 268.40(b) (HWIMS 700)

— — — —

3) Are alternative methods approved? 40 CFR 268.2

— — — —

4) Is the LDR treatment standard lower than the Characteristic level?

— — — —

a. If yes, does the facility manage the waste as restricted until treatment standards are met?
40 CFR 268.9

— — — —

5) Does the facility test residues from all treatment processes? 40 CFR 268.7

— — — —

F. REQUIRED NOTICES

		<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1)	Has the Regional Administrator/Environmental Management Board been notified regarding:				
a.	Receipt of hazardous waste from a foreign source? <u>40 CFR 265.12(a)</u> (HWIMS 300)	—	—	—	✓
b.	Facility expansion? <u>40 CFR 270.72(b)</u> (HWIMS 610)	—	—	—	—
c.	Change of owner or operator? <u>40 CFR 265.12(b)</u> (HWIMS 300)	—	—	—	✓

G. GENERAL WASTE ANALYSIS:

(HWIMS 310)

1)	Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing or knowledge of the process? <u>40 CFR 265.13(a)1</u>	MP ✓	—	—	✓
2)	Does the owner or operator have a detailed waste analysis plan on file at the facility? <u>40 CFR 265.13(b)</u>	MP ✓	—	—	✓
3)	Does the waste analysis plan contain:				
a.	parameters (and rationale for their choice)	MP ✓	—	—	✓
b.	test methods	MP ✓	—	—	✓
c.	sampling method for representative sample	MP ✓	—	—	✓
d.	frequency of analysis (and rationale)	MP ✓	—	—	✓
e.	off-site only: waste analysis from generators	MP ✓	—	—	✓
f.	Additional waste analysis needed for: change in waste type or process occurs)				
i.	<u>265.200 Tanks</u>	—	—	—	✓
ii.	<u>265.225 Impoundment</u>	—	—	—	✓
iii.	<u>265.252 Waste Pile</u>	—	—	—	* ✓
iv.	<u>265.273 Land Treatment</u>	—	—	—	✓
v.	<u>265.341 Incinerators</u>	—	—	—	✓

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
vi. <u>265.375 Thermal Treatment</u>	—	—	—	✓
vii. <u>265.402 Other Treatment</u>	—	—	—	✓
viii. <u>268 LDR Standards</u>	—	—	—	✓

- | | | | | |
|--|---|---|---|---|
| 4) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?
<u>40 CFR 265.13(c)</u> | — | — | — | ✓ |
| 5) Is the waste analysis plan followed? | ✓ | — | — | — |

H. GENERAL INSPECTION REQUIREMENTS (HWIMS 320)

- | | | | | |
|--|---|---|---|---|
| 1) Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?
<u>40 CFR 265.15(a)</u> | ✓ | — | — | — |
| 2) Does the owner or operator have an inspection schedule at the facility?
<u>40 CFR 265.15(b)2</u> | — | — | — | ✓ |
| 3) If so, does the schedule address the inspection of the following items:
<u>40 CFR 265.15(b)1</u> | | | | |
| a. monitoring equipment? | — | — | — | ✓ |
| b. safety and emergency equipment? | — | — | — | ✓ |
| c. security devices (including fences)? | — | — | — | ✓ |
| d. operating and structural equipment (ie. dikes, pumps, etc.)? | — | — | — | ✓ |
| e. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)?
<u>40 CFR 265.15(b)(2)</u> | — | — | — | ✓ |

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| f. inspection frequency (based upon the possible deterioration rate of the equipment)?
<u>40 CFR 265.15(b)(4)</u> | — | — | — | ✓ |
| g. Does the inspection frequency include: | | | | |
| i. Weekly container storage?
(See 265.174) | — | — | — | — |
| ii. Daily and Weekly Tank Storage?
(See 265.195) | — | — | — | — |
| iii. Daily freeboard and weekly dike inspection for surface impoundments?
(See 265.226) | — | — | — | — |
| iv. Landfills, Waste Piles, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely)
[See 265.15(b)(4)] | — | — | — | ✓ |

- | | | | | |
|--|---|---|---|---|
| 4) Does Owner or Operator follow the written inspection schedule as outlined?
<u>265.15(b)(1)</u> | ✓ | — | — | — |
| 5) Are areas subject to spills inspected daily when in use?
<u>265.15(b)(4)</u> | — | — | — | ✓ |

- | | | | | |
|--|---|---|---|---|
| 6) Does the owner or operator maintain an inspection log or summary of owner or operator inspections?
<u>40 CFR 265.15(d)</u> | ✓ | — | — | — |
| 7) Does the inspection log contain the following information:
<u>40 CFR 265.15(d)</u> | | | | |
| a. the date and time of the inspection? | ✓ | — | — | — |
| b. the name of the inspector? | ✓ | — | — | — |

Records
at
Safety
Office

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
c. a notation of the observations made?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
d. the date and nature of any repairs or remedial actions?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>

I. PERSONNEL TRAINING

1) Do personnel training records include: (HWIMS 330)

a. Job titles for the positions related to HWM <u>40 CFR 265.16(d)1</u>	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
b. The name of the employees filling each job title? <u>40 CFR 265.16(d)(1)</u>	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position? <u>40 CFR 265.16(d)2</u>	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator ✓ Training coordinator ✓ Emergency response personnel ✓
 Inspectors ✓ Material handlers ✓ Container labelers ✓ Manifesters ✓
 Recordkeepers ✓

d. Description of both introductory and continuing training required for each job? <u>40 CFR 265.16(d)(3)</u>	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
e. Records of training required in (d)? <u>40 CFR 265.16(d)4</u>	<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>

Describe in general the type of training program in use at the facility.

* See attachments for Hazardous Waste Handlers

- f. Did facility personnel receive the required training including:

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
i) classroom or on the job	✓	—	—	—
ii) within 6 months of hire	✓	—	—	—
iii) annual review of training?	✓	—	—	—
g. Are <u>all</u> training records maintained for current personnel and for at least three years for former employees? <u>40 CFR 265.16(e)</u>	✓	—	—	—

J. CONTINGENCY PLAN AND EMERGENCY PROCEDURES (HWIMS 350)

- 1) Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with <u>265.51</u> and <u>265.56</u> in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).	✓	—	—	—
b. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services.	✓	—	—	—
c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?	✓	—	—	—
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? <u>40 CFR 265.52(e)</u>	✓	—	—	—

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)
<u>40 CFR 265.52(f)</u> | ✓ | — | — | — |
| 2) Emergency Coordinator: | | | | |
| a. Is the facility Emergency Coordinator identified?
<u>40 CFR 265.52(d)</u> | ✓ | — | — | — |
| b. Is coordinator familiar with all aspects of site operation and emergency procedures?
<u>40 CFR 265.55</u> | ✓ | — | — | — |
| c. Does Emergency Coordinator have the authority to carry out the Contingency Plan?
<u>40 CFR 265.55</u> | ✓ | — | — | — |

K. PREPAREDNESS AND PREVENTION

- | | | | | |
|--|---|---|---|---|
| 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?
<u>40 CFR 265.37</u> (HWIMS 340) | ✓ | — | — | — |
| 2) Are copies of the Contingency Plan available at the site and local emergency organizations?
<u>40 CFR 265.53</u> (HWIMS 350) | ✓ | — | — | — |
| 3) Emergency Procedures | | | | |
| If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in <u>40 CFR 265.56 (329 IAC 3-18-7)?</u>
(HWIMS 350) | — | — | — | ✓ |

L. MANIFEST SYSTEM (off-site facilities)

(HWIMS 360)

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
	Does not receive off site waste			
1) Does the facility follow the procedures listed in <u>265.71</u> for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	✓
2) Are records of past shipments retained for three (3) years? <u>40 CFR 265.71(b)5</u>	—	—	—	—
3) Has the facility submitted copies of hazardous waste manifests to the Department within five (5) working days after receiving hazardous waste? (This requirements applies to both Indiana's and other states hazardous waste manifests)?	—	—	—	—
4) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) <u>40 CFR 265.72</u>	—	—	—	—
5) Unmanifested Waste Reports:				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 329 IAC 3.1-7-3 (3-8-1) without a manifest or shipping paper? <u>40 CFR 265.76</u>	—	—	—	—
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.				↓

-
- c. Has the facility submitted an unmanifested waste report within 15 days after receiving the waste?

— — — ✓

M. CLOSURE/POST CLOSURE

1) Is the closure plan available for inspection? <u>40 CFR 265.112(a)</u> (HWIMS 390)	✓	—	—	—
2) Is the post-closure plan available for inspection? (for disposal facilities only) <u>40 CFR 265.118(a)</u> (HWIMS 390)	—	—	—	✓
3) Has the closure cost and post closure cost estimate been revised annually to account for inflation. (<u>329 IAC 3.1-14-3</u>) (HWIMS 400)	✓	—	—	—

N. OPERATING RECORD

(HWIMS 370)

OK DF NI NA

No

- 1) Does owner or operator have a operating record?
40 CFR 265.73(a)
- 2) Does the owner or operator maintain an operating record that contains the following information?
 - a. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (including tanks)?
40 CFR 265.73(b)(1)

Not true T:
but does Re:
Records on
Wastes Gener

Summarize how the facility tracks the method and date of TSD activity.

- b. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.)
40 CFR 265.73(b)(2)

Summarize how the facility tracks the location and quantity of waste.

- c. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.)
40 CFR 265.73(b)(2)
- d. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections, including those conducted for LDR standards?
40 CFR 265.73(b)(3)(5)(6)
- e. Reports detailing all incidents that required implementation of the Contingency Plan?
40 CFR 265.73(b)(4)
- f. All closure and post closure costs as applicable?
40 CFR 265.73(b)(7)

- g. Copies of LDR notifications and
certifications?
40 CFR 265.73 b (11)(13)(15)

— — — ✓

O. GROUNDWATER MONITORING

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

OK DF NI NA

- 1) Has the owner or operator of the facility implemented
a groundwater monitoring system?
40 CFR 265.90(a) (HWIMS 380)

— — — ✓

- 2) Has the owner or operator of the facility implemented
an alternate groundwater monitoring system as described
in 265.90(d)? (HWIMS 380)

— — — ✓

Ground Water Monitoring system in place to show:
clean closure for Waste Pile. No Actual 40 CFR 265.90 system
in place

GENERATOR REQUIREMENTS

Complete the following sections if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
P. <u>MANIFEST SYSTEM</u> (generator) (HWIMS 110)				
1) For hazardous waste shipments to Indiana facilities (or hazardous waste shipments to states that do not supply manifests) has the generator used the Indiana Hazardous Waste Manifest? <u>329 IAC 3.1-7-4</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Does the operator have copies of the manifest available for review? <u>40 CFR 262.40 (329 IAC 3.1-7-6)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Have manifests been retained for 3 years? <u>(40 CFR 262.40)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				<u>Approx 120 from 4-92 → 10-92</u>
5) Do the manifest forms examined contain the following information? <u>40 CFR 262.21 (329 IAC 3.1-7-8)</u>				
a. Manifest document number? EPA ID No. + Unique 5 digit No.? (five digit unique number)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Name, telephone number (3.1-7-11) and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Name, Address, telephone number (3.1-7-11) and EPA ID Number of designated permitted facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>MP</u>	<u>#1</u>	<input type="checkbox"/>	<input type="checkbox"/>
g. Required waste minimization certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. EPA hazardous waste numbers (3.1-7-11)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	OK	DF	NI	NA
j Handling Codes (3.1-7-11)?	✓	—	—	—
k. Additional waste numbers included in box J.	✓	—	—	—
6) Has the generator submitted copies of hazardous waste manifests to the Department within five (5) working days after shipping hazardous waste? (This requirement applies to both Indiana's and other states hazardous waste manifests). <u>329 IAC 3.1-7-6</u>	—	✓	—	—
see #1				
7) Reportable exceptions: <u>40 CFR 262.42</u> (HWIMS 180)				
a. For manifests examined (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.				None
b. For manifests indicated in question (7a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Commissioner.		0		

Q. <u>EPA IDENTIFICATION NUMBERS</u>	(HWIMS 090)	OK	DF	NI	NA
1) Has the generator received an EPA identification number prior to treating, storing, disposing of, transporting, or offering for transportation, hazardous waste? <u>40 CFR 262.12(a)</u>		—	—	—	✓
2) Has the generator offered his hazardous waste to transporters or to TSD facilities that have received an EPA identification number? <u>40 CFR 262.12(c)</u>		—	—	—	—
<hr/>					
R. <u>INTERNATIONAL SHIPMENTS</u>	(HWIMS 190)				
1) Has the installation imported or exported hazardous waste? <u>40 CFR 262.50</u> (If answered Yes, complete the following as applicable.)		—	—	—	—
a. Exporting hazardous waste; has a generator:					
i. Notified the administrator and OSHWM/IDEM in writing?		—	—	—	✓

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	—	—	—	✓
iii. Met the Manifest requirements?	—	—	—	↓
b. Importing hazardous waste; has the generator met the manifest requirements?	—	—	—	↓

<u>S. LAND BAN NOTIFICATION REQUIREMENTS</u> (HWIMS 700)		<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1)	Does the generator provide a notification to the TSD facility with each shipment, even if waste meets treatment standards? <u>40 CFR 268.7</u>	✓	—	—	—
2)	Does the notification include the following: (if possible, make copies of, or record information from notification(s) that do not contain the necessary information) <u>40 CFR 268.7</u>	✓	—	—	—
a.	EPA hazardous waste number	✓	—	—	—
b.	Treatment standards (for wastes other than F001-F005 and F039, treatment standards may be referenced by including sub-category, treatability group, and CFR sections and paragraph where treatment standards appear)	✓	—	—	—
c.	Where treatment standards is specified technology, applicable five-letter treatment code?	✓	—	—	—
d.	Manifest number	✓	—	—	—
e.	If the waste meets treatment standards, or if alternate treatment standards for lab packs are specified, does it have proper certification statement?	—	—	—	✓
f.	Waste analysis data, if available.	✓	—	—	—
3)	Has the generator retained on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to 268.7 for at least five (5) years? <u>268.7(a)(7)</u>	✓	—	—	—

T. RECORDKEEPING AND REPORTING

OK DF NI NA

- 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility, including correct LDR treatability group and treatment standard?

40 CFR 262.11 and 40 CFR 268.7(a) & 268.9 (HWIMS 100) ✓

- a. If DF, list below:

Assigned Classification

Correct Classification

- b. Which of the following methods does the generator employ for waste determination?

i. Knowledge of waste

ii. Analysis. Specify _____

- 2) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?

40 CFR 262.40

(HWIMS 180)

✓

- 3) Has the generator submitted biennial reports as required? 329 IAC 3.1-7-14)

(HWIMS 180)

✓

U. WASTE MINIMIZATION

(HWIMS 100)

- 1) Does the generator have a written waste minimization plan?

- a. If a written plan is not available, briefly describe the waste minimization program as presented by the company representative.

K-048 → Kosi Sludge is being dewatered at new
Wastewater Treatment Plant. producing Approx. 1 y³ of Hazardous Waste
Per day.

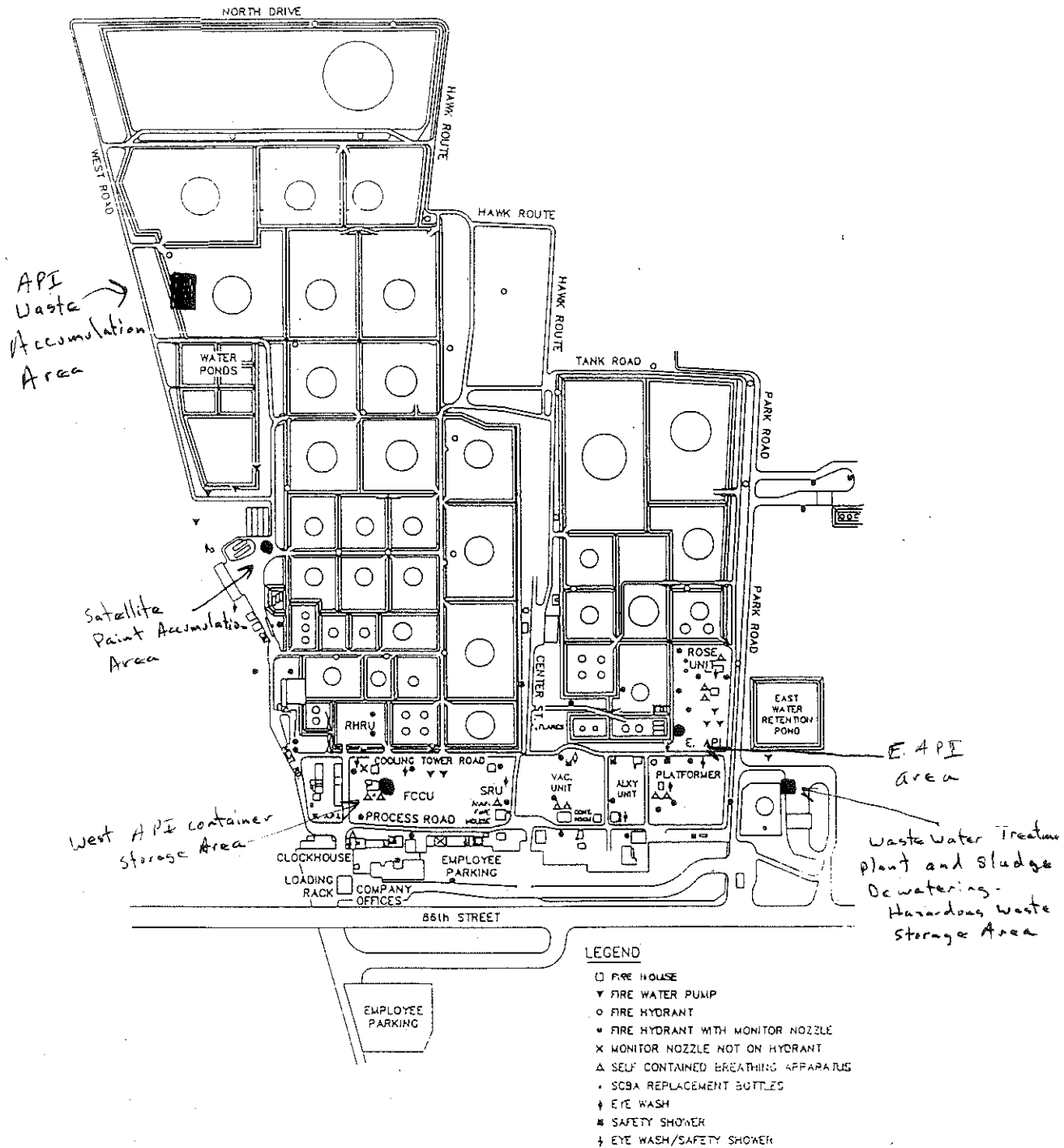
- 2) Does the biennial report include the required waste minimization information?
(40 CFR 265.7(h) and (J)/IC 13-7-27-7)

<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

- 3) Note any discrepancies between the written or oral plan, and observed on-site waste minimization activities. _____
- _____
- _____
- _____

Attachment 7.5

Fire and Safety Equipment Location



MULTIPLE SATELLITE ACCUMULATION APPENDIX

Location/Description of Unit Maintenance Shop

Process Generating The Waste Parts Cleaner

A. GENERAL OPERATING REQUIREMENTS

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? <u>40 CFR 262.34</u> | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed? <u>40 CFR 262.34</u> | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |

Location/Description of Unit Wastewater Treatment Plant

Process Generating The Waste Hazardous Sludge Dewatering unit
< 90 Day storage

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 3) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? <u>40 CFR 262.34</u> | <u>✓</u> | <u>#2</u> | <u>—</u> | <u>—</u> |
| 4) Are containers in good condition, compatible with the wastes in them and stored closed? <u>40 CFR 262.34</u> | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |

Location/Description of Unit _____

Process Generating The Waste _____

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 5) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? <u>40 CFR 262.34</u> | <u>—</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 6) Are containers in good condition, compatible with the wastes in them and stored closed? <u>40 CFR 262.34</u> | <u>—</u> | <u>—</u> | <u>—</u> | <u>—</u> |

GENERATOR ACCUMULATION APPENDIX
(HWIMS 120)

Location/Description of Unit ApI Separator (West)

A. GENERAL OPERATING REQUIREMENTS

OK DF NI NA

- 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
40 CFR 262.30-262.32

✓ — — —

- 2) Is the container clearly marked with the start of accumulation date?
40 CFR 262.34

✓ — — —

- 3) Has the generator accumulated hazardous waste on-site for 90 days or less?
40 CFR 262.34

✓ — — —

- 4) Do wastes remain in accumulation tanks for more than 90 days?
40 CFR 262.34

— — — ✓

- 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
40 CFR 262.34

✓ — — —

B. SATELLITE ACCUMULATION (HWIMS 120)

- 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
40 CFR 262.34

— — — +

- 2) Are containers in good condition, compatible with the wastes in them and stored closed?
40 CFR 262.34

— — — +

GENERATOR ACCUMULATION APPENDIX
(HWIMS 120)

Location/Description of Unit Facility Accumulation Area
< 40 storage North

OK DF NI NA

A. GENERAL OPERATING REQUIREMENTS

- 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
40 CFR 262.30-262.32

✓ — — —

- 2) Is the container clearly marked with the start of accumulation date?
40 CFR 262.34

— #2
✓ — — —

- 3) Has the generator accumulated hazardous waste on-site for 90 days or less?
40 CFR 262.34

✓ — — —

- 4) Do wastes remain in accumulation tanks for more than 90 days?
40 CFR 262.34

no
✓ — — —

- 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
40 CFR 262.34

— #2
✓ — — —

3-20,000 Gallon Containers were not labeled "Hazardous Waste" or Marked with Accumulation start Date

B. SATELLITE ACCUMULATION (HWIMS 120) Paint Shop

- 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
40 CFR 262.34

✓ — — —

- 2) Are containers in good condition, compatible with the wastes in them and stored closed?
40 CFR 262.34

✓ — — —

Container Management Appendix

(HWIMS 100/410)

40 CFR Part 265 as referenced by 262.44

Location/Description of Unit API Separator (West) + (East)

OK DF NI NA

A. GENERAL OPERATING REQUIREMENTS

- | | | | | |
|---|----------|-----|-----|-----|
| 1) Are containers in good condition? (40 CFR 265.171) | <u>✓</u> | ___ | ___ | ___ |
| 2) Are containers compatible with waste in them?
(40 CFR 265.172) | <u>✓</u> | ___ | ___ | ___ |
| 3) Are containers managed to prevent leaks? (40 CFR 265.173(b)) | <u>✓</u> | ___ | ___ | ___ |
| 4) Are containers stored closed? (40 CFR 265.173(d)) | <u>✓</u> | ___ | ___ | ___ |
| 5) Are ignitable and reactive wastes stored at least 15
meters (50 feet) from the property line? (Indicate if
waste is ignitable or reactive). (40 CFR 265.176) | <u>✓</u> | ___ | ___ | ___ |
| 6) Are incompatible wastes stored in separate containers?
(If not the provisions of 40 CFR 265.17(b) apply)
(40 CFR 265.177(a)) | <u>✓</u> | ___ | ___ | ___ |
| 7) Are containers of incompatible waste separated or
protected from each other by physical barriers or
sufficient distance? (40 CFR 265.177(c)) | <u>✓</u> | ___ | ___ | ___ |
| 8) If required, are the following special requirements for
ignitable, reactive, or incompatible wastes addressed?
(40 CFR 265.17(a)) | | | | |
| a. Special handling? | <u>✓</u> | ___ | ___ | ___ |
| b. No Smoking signs? | <u>✓</u> | ___ | ___ | ___ |
| c. Separation and protection from ignition sources? | <u>✓</u> | ___ | ___ | ___ |
| 9) Does the container storage area have adequate aisle space
(40 CFR 265.35) | <u>✓</u> | ___ | ___ | ___ |
| 10) Are containers inspected weekly for leaks, deterioration,
corrosion, or other factors? (40 CFR 265.174) | <u>✓</u> | ___ | ___ | ___ |

B. PREPAREDNESS AND PREVENTION

- | | | | | |
|--|----------|-----|-----|-----|
| 1) Security - Do security measures include: (HWIMS 300)
(40 CFR 265.14) (TSD facilities only) | | | | |
| a. 24- hour surveillance which continuously monitors
and controls entry? | <u>✓</u> | ___ | ___ | ___ |

OK DE NI NA

- b. Artificial or natural barrier around facility and controlled entry at all times? ☒ ☐ ☐ ☐
- c. Danger sign(s) at entrance? ☒ ☐ ☐ ☐
- 2) Has the facility been maintained and (HWIMS 140/340, 810 spill) operated to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituent? (40 CFR 265.31) ☒ ☐ ☐ ☐ #3
- 3) If required, does the facility have the following equipment: (HWIMS 140/340)
- a. Internal communications or alarm systems? (40 CFR 265.32(a) & 40 CFR 265.34(a)) ☒ ☐ ☐ ☐
- b. Telephone or 2-way radios at the scene of operations? (40 CFR 265.32(b) & 40 CFR 265.34(b)) ☒ ☐ ☐ ☐
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (Please specify) ☒ ☐ ☐ ☐
- d. Water at adequate volume and pressure to supply water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) (40 CFR 265.32(d)) ☒ ☐ ☐ ☐
- 4) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (40 CFR 265.34(a)) (HWIMS 140/340) ☒ ☐ ☐ ☐

C. TESTING AND MAINTENANCE OF EMERGENCY EQUIPMENT (HWIMS 140/340)

- 1) a. Has the owner or operator established testing and maintenance procedures for emergency equipment? (40 CFR 265.33) ☒ ☐ ☐ ☐
- b. Is emergency equipment in operable condition? (40 CFR 265.33) ☒ ☐ ☐ ☐
- 2) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) (40 CFR 265.35) ☒ ☐ ☐ ☐

* Hazardous Waste Spill observed at API Separator East

Container Management Appendix

(HWIMS 160/410)

40 CFR Part 265 as referenced by 262.34

Location/Description of Unit Facility Accumulation Area
< 90 Day Storage Area North

OK DF NI NA

A. GENERAL OPERATING REQUIREMENTS

- | | | | | |
|---|----------|-----|-----|-----|
| 1) Are containers in good condition? (40 CFR 265.171) | <u>✓</u> | ___ | ___ | ___ |
| 2) Are containers compatible with waste in them?
(40 CFR 265.172) | <u>✓</u> | ___ | ___ | ___ |
| 3) Are containers managed to prevent leaks? (40 CFR 265.173(b)) | <u>✓</u> | ___ | ___ | ___ |
| 4) Are containers stored closed? (40 CFR 265.173(d)) | <u>✓</u> | ___ | ___ | ___ |
| 5) Are ignitable and reactive wastes stored at least 15
meters (50 feet) from the property line? (Indicate if
waste is ignitable or reactive). (40 CFR 265.176) | <u>✓</u> | ___ | ___ | ___ |
| 6) Are incompatible wastes stored in separate containers?
(If not the provisions of 40 CFR 265.17(b) apply)
(40 CFR 265.177(a)) | <u>✓</u> | ___ | ___ | ___ |
| 7) Are containers of incompatible waste separated or
protected from each other by physical barriers or
sufficient distance? (40 CFR 265.177(c)) | <u>✓</u> | ___ | ___ | ___ |
| 8) If required, are the following special requirements for
ignitable, reactive, or incompatible wastes addressed?
(40 CFR 265.17(a)) | | | | |
| a. Special handling? | <u>✓</u> | ___ | ___ | ___ |
| b. No Smoking signs? | <u>✓</u> | ___ | ___ | ___ |
| c. Separation and protection from ignition sources? | <u>✓</u> | ___ | ___ | ___ |
| 9) Does the container storage area have adequate aisle space
(40 CFR 265.35) | <u>✓</u> | ___ | ___ | ___ |
| 10) Are containers inspected weekly for leaks, deterioration,
corrosion, or other factors? (40 CFR 265.174) | <u>✓</u> | ___ | ___ | ___ |

B. PREPAREDNESS AND PREVENTION

- | | | | | |
|--|----------|-----|-----|-----|
| 1) Security - Do security measures include: (HWIMS 300)
(40 CFR 265.14) (TSD facilities only) | | | | |
| a. 24- hour surveillance which continuously monitors
and controls entry? | <u>✓</u> | ___ | ___ | ___ |

OK DF NI NA

- b. Artificial or natural barrier around facility and controlled entry at all times? ☒ ☐ ☐ ☐
- c. Danger sign(s) at entrance? ☒ ☐ ☐ ☐
- 2) Has the facility been maintained and (HWIMS 140/340, 810 spill) operated to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituent? (40 CFR 265.31) ☒ ☐ ☐ ☐
- 3) If required, does the facility have the following equipment: (HWIMS 140/340)
- a. Internal communications or alarm systems? (40 CFR 265.32(a) & 40 CFR 265.34(a)) ☒ ☐ ☐ ☐
- b. Telephone or 2-way radios at the scene of operations? (40 CFR 265.32(b) & 40 CFR 265.34(b)) ☒ ☐ ☐ ☐
- c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (Please specify) ☒ ☐ ☐ ☐
- d. Water at adequate volume and pressure to supply water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) (40 CFR 265.32(d)) ☒ ☐ ☐ ☐
- 4) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? (40 CFR 265.34(a)) (HWIMS 140/340) ☒ ☐ ☐ ☐

C. TESTING AND MAINTENANCE OF EMERGENCY EQUIPMENT (HWIMS 140/340)

- 1) a. Has the owner or operator established testing and maintenance procedures for emergency equipment? (40 CFR 265.33) ☒ ☐ ☐ ☐
- b. Is emergency equipment in operable condition? (40 CFR 265.33) ☒ ☐ ☐ ☐
- 2) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) (40 CFR 265.35) ☒ ☐ ☐ ☐

HAZARDOUS WASTE BURNED FOR ENERGY RECOVERY APPENDIX

40 CFR 266, Subpart D
329 IAC 3.1-11-1

Section A. is for marketers and Section B. for burners
(HWIMS 500)

A. MARKETERS

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1) Has this facility notified as a Marketer? <u>40 CFR 266.34(b)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Is the hazardous waste fuel stored as a hazardous waste? <u>40 CFR 266.34(c)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Is the hazardous waste fuel shipped off-site in compliance with the Standards for Generators in 40 CFR 262? <u>40 CFR 266.34(d)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Does the marketer distribute hazardous waste fuel only to persons who have notified U.S. EPA of their hazardous waste fuel marketing or burning activities, and, if a burner, who will burn the hazardous waste only in industrial furnaces, industrial boilers, or utility boilers? 40 CFR 266.31	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) Prior to initiating the first shipment, has the marketer obtained a one-time written and signed certification from the burner or other marketer that;				
a. The burner or marketer has notified of their "waste as fuel" activities? <u>40 CFR 266.34(e)(1)(i)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If the recipient is a burner, the waste will be burned only in approved industrial furnaces or boilers (See 266.31(a)(2)b)? <u>40 CFR 266.34(e)(1)(ii)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6) Has the marketer provided a one-time written and signed certification that he has notified of his "waste as fuel" activity prior to his first shipment of fuel to another marketer? <u>40 CFR 266.34(e)(2)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| 7) Are all certifications received or sent by the marketer maintained at the site for at least three (3) years?
<u>40 CFR 266.34(f)</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Comments:

B. BURNERS

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|--------------------------|--------------------------|--------------------------|--------------------------|
| 1) Has this facility notified as a Burner?
<u>40 CFR 266.35(b)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2) Is the hazardous waste fuel burned only in an approved industrial furnace or boiler?
<u>40 CFR 266.31(b) & 40 CFR 260.10</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3) If the burner is a cement kiln within the boundaries of any incorporated municipality with a population greater than 500,000, does the burner comply with 40 CFR 264/265, Subpart O, incinerator standards? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4) Is the hazardous waste fuel managed in compliance with 40 CFR 265/40 CFR 264 (existing/new storage facilities) or 40 CFR 262.34 (generators who burn on-site)? <u>40 CFR 266.35(c)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5) Has the burner provided the marketer with a written and signed certification that he has notified of waste as fuel activities and that he will burn only in approved furnaces or boilers? <u>40 CFR 266.35(d)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 6) Are certification forms provided to marketers maintained on file for at least three (3) years?
<u>40 CFR 266.35(e)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Comments:

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: / /

BY: MLP

COMPANY: Marathon Oil Co.

LOCATION: Marion County

I.D.#: IND/006/417/430

Type of inspection: (G) ~~T~~ (TSD) ~~Closure~~ ~~Complaint~~ ~~Other~~ (please specify)

A. GENERAL

	<u>YES</u>	<u>NO</u>	<u>NA</u>
1. FEDERAL NOTIFICATION ON FILE?	<u>✓</u>	<u> </u>	<u> </u>
2. FEDERAL PART A ON FILE?	<u>✓</u>	<u> </u>	<u> </u>
3. CLOSURE PLAN REVIEWED?	<u>✓</u>	<u> </u>	<u> </u>
4. CONTINGENCY PLAN REVIEWED?	<u>✓</u>	<u> </u>	<u> </u>
5. BIENNIAL REPORT REVIEWED?	<u>✓</u>	<u> </u>	<u> </u>
*6. PART B PERMIT REVIEWED?	<u> </u>	<u> </u>	<u>✓</u>

*(Note any Special Permit Conditions)
Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

K049 → K052 Wastes.

D001 D002 — Acidizing Solution D001/F003 Paint wastes?
✓ Safety Kleen

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

(K049 K050 K051) (Waste Pile) closed?

D008

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

Spill Clean-up Materials

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

NA

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	<u>Code</u>	<u>Amount</u>	<u>Unit of Measure</u>
1.	<u>502 (Tank Storage)</u>		
2.	<u>T01 (Tank Treatment)</u>		
3.	<u>T03 (Incinerator Treatment)</u>		
4.	<u>T04 (Other Treatment)</u>		
5.	<u>D81 (Land Application)</u>		

Are there any discrepancies regarding multiple Part A submittals?

G. CLOSURE/POST-CLOSURE

1. Are there any closed units? If yes, describe.

Hazardous waste Pile "Goat Hill"

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

<u>Date of Inspection</u>	<u>Action Type</u>	<u>Date of Action</u>
<u>4-28-1992</u>	<u>VL</u>	<u>4-28-93</u>
<u>12-91 + 12-12-90</u>	<u>VL</u>	<u>4-591</u>

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

VL-11470 Issued 5-3-93 ^{2 55 gal.} #1 open drums waste from API separator
#2 Same Drums not labeled hazardous waste #3 Same drums no accumulation
start date #4 Need Signed Notice From BIF for waste acceptance for fuel burning
#5 Waste Determination needed for 1 ^{Red + Black} container of waste in API waste accumulat^{area}.

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

Feb. 1992 { Shipping restricted waste without complete notifications
retain copies of notifications for 5 yrs.

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR NEED FIELD VERIFIED, INCLUDING WASTE MINIMIZATION REQUIREMENTS IN ENFORCEMENT ORDER AND SETTLEMENT AGREEMENTS.

L. COMMENTS

2455v

Revised 8/19/92



Indiana Department of Environmental Management

VERIFICATION OF INSPECTION

This is to verify that on May 21, 1993 an inspection of _____

Marathon Oil Company was conducted by the

undersigned representatives of the Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management. The inspection was conducted to determine compliance with the Resource Conservation and Recovery Act (RCRA), IC 13-7, and rules promulgated pursuant to those statutes.

A summary of violations and concerns noted during the inspection were verbally communicated to the undersigned company representatives during the inspection. The company is encouraged to correct deficiencies as soon as possible. Corrections made and verified during the inspection may still be cited as violations; however, prompt action will be taken into consideration in determining the resolution to any enforcement action which may be taken.

Your company will be sent a preliminary summary of the violations identified as a result of the inspection within thirty (30) days of the inspection. The summary may identify violations not noted during the inspection if they surfaced as a result of a more extensive analysis of the rules or further review of records in the possession of the Department. The company is encouraged to contact the inspector to clarify any misunderstandings which you believe may be reflected in the inspection summary.

IDEM: Printed Name	Signature	Position	Phone #	Date
Mike Penington	<i>Mike Penington</i>	Env. Scientist	³¹⁷ 233-4994	5-21-93

Company: Printed Name	Signature	Position	Phone #	Date
Patricia B. Sorensen	<i>Patricia B. Sorensen</i>	Env. Coordinator	³¹⁷ 872-3200	5/21/93

Company Mailing Address

Marathon Oil Company, Indiana Refining Division
5000 W. 86th St, Indianapolis, IN 46268

Description of Violations

Marathon Oil Company
IND 006417430

Inspection of May 21, 1993

1. Page 16 & 17

329 IAC 3.1-7-6

Generator copies had not been submitted to the Department of Environmental Management for these manifests, among others, generated during 1992: INA0707910, INA0707301, INA0707321, and INA0707315.

2. Page 22 & 24

40 CFR 262.34

Three (3) 20,000-gallon containers located in the facility accumulation area (north), and four (4) cubic yard containers located at the waste water treatment plant sludge dewatering unit had not been labeled with the words "Hazardous Waste" and had not been labeled with the appropriate accumulation start dates.

All containers at these locations were properly marked and labeled during the inspection.

3. Page 26

40 CFR 265.31

A release of K048 through K051 hazardous waste sludge was observed on the northeast corner of the east API separator where accumulation drums are usually filled.

To prevent the continuing threat to the environment, visible contamination should be removed and properly containerized immediately.

Sylvester

TSD - RCRA INSPECTION REPORT

(Interim Status Facility - 329 IAC 3.1-10)

EPA ID # IND 006417430 NAME MARATHON OIL COMPANY

MAILING ADDRESS: 5000 W. 86th Street
INDIANAPOLIS, IN 46228

LOCATION ADDRESS: SAME

CONTACT: PAT SORENSON PHONE: 317/872-3200

OWNERSHIP: MARATHON OIL Comp. COUNTY: MARION

STATUS CODE: 1 ACTING AS
GENERATOR ONLY
1=Active 3=Dead Mail 4=PCB handler
6=non-handler 2=Obsolete ID # 9=Superfund site
5=Out of business

Person(s) interviewed: Title: Telephone:
PAT SORENSON ENVIRONMENTAL MGR 317/872-3200

LYNDA RIDS ENVIRONMENTAL ENGINEER "

Inspector(s): Agency: Telephone:
ROBERT MALONE PROJECT MANAGER 317/237-3600
ONTARIO ENVIRONMENTAL

Date of inspection: 4/27/92 Time of inspection: 7:45 AM

Hazardous Waste Management Permit Program and Related Hazardous Waste Requirements, 329 IAC 3.1, incorporates by reference federal standards for the management of hazardous waste which have been published in the code of federal regulations in 40 CFR 260 through 40 CFR 270 as of July 1, 1990. Citations contained in this inspection form shall be to the federal rules as incorporated, except where the State rule substitutes full text language, in which case the specific 329 IAC 3.1 citation will be used.

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JUL 21 1992

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

IND 006 417 430

ATTACHMENT A

Installation Processes by Process Code (EPA Form 3510-3)

S01 ☐ Container storage
 S02 ☐ Tank storage
 S03 ☐ Waste pile storage
 S04 ☐ Surface impoundment storage
 T01 ☐ Tank treatment
 T02 ☐ Surface impoundment treatment
 T03 ☐ Incinerator treatment
 T04 ☐ Other treatment
 D79 ☐ Injection well disposal
 D80 ☐ Landfill disposal
 D81 ☐ Land application disposal
 D83 ☐ Surface impoundment disposal

LAND APPLICATION - NOT REGULATED
 If Part A process codes are listed above as T04 please describe the process involved below:
FACILITY OPERATED A WASTE PILE AT GOAT HILL IN THE PAST. THE WASTE PILE WAS NOT MARKED ON THE PART WASTE PILE REMOVED - CLOSURE CERTIFIED - Awaiting

- IDEM APPROVAL

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.
3. Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or non-hazardous)!

OIL REFINERY - MAINLY LIGHT FRACTIONS

4. If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

	<u>YES</u>	<u>NO</u>
A) Waste Oil Fuel - Appendix A	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Lead Acid Batteries	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Hazardous Waste Fuel - Appendix C	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) <u>GENERATE - SHIP OFF-SITE AS MARKETER TO</u> Precious Metals <u>BURNER.</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E) Use Constituting Disposal	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) Tanks	<input type="checkbox"/>	<input checked="" type="checkbox"/>

G) Use and Management of Containers	<u>X</u>	<u>—</u>
H) Generator Accumulation Appendix	<u>X</u>	<u>—</u>
I) Waste Pile (REMOVED - Awaiting CLOSURE CERT. ACCEPTANCE)	<u>—</u>	<u>X</u>
J) Surface Impoundment	<u>—</u>	<u>X</u>
K) Landfill	<u>—</u>	<u>X</u>
L) Process Vents	<u>—</u>	<u>X</u>
M) Equipment Leaks	<u>—</u>	<u>X</u>

5) Hazardous Waste Streams/EPA #	Source (Contractor)	Rate	Disposition	LDR Treatability Group
<u>D001, F003</u> <u>K048, 49, 50, 51, D018,</u> <u>D001</u>	<u>PAINT WASTE</u> <u>API, HEAT</u> <u>EXCHANGER,</u> <u>SHOP OIL</u>	<u>VARIABLE</u> <u>3-5,000 GAL/WK.</u>	<u>SAFETY KLEEN</u> <u>Systech</u> <u>Symtech</u> <u>(Coplay)</u>	<u>(WW/NWW)</u> <u>NWW</u>
<u>K048, 49, 50, 51, D018</u>	<u>LI</u>	<u>3-5 DMS-quarter</u>	<u>LWD</u>	<u>NWW</u>
<u>K052</u>	<u>LEADED TANK</u> <u>BOTTOMS</u>	<u>2 DMS. qtr.</u>	<u>LWD</u>	<u>NWW</u>
<u>D008</u>	<u>SAND BLAST</u>	<u>ONE TIME</u> <u>30 ROLL-OFFS</u>	<u>CWM</u>	<u>NWW</u>
<u>D018</u>	<u>SOIL/BENZENE</u>	<u>1 TIME</u> <u>6-7 BOXES</u>	<u>CWM</u>	<u>NWW</u>
<u>D007</u>	<u>SPILL CLEAN-UP</u> <u>GRAVEL/CHROMATES</u>	<u>1 TIME</u> <u>30 yds.</u>	<u>CWM</u>	<u>NWW</u>
<u>D002</u>	<u>ACIDIZING SOLUTION</u>	<u>46,000 LBS.</u> <u>YR.</u>	<u>HES</u>	<u>NWW</u>
<u>D001</u>	<u>PARTS WASHER</u>	<u>17,000 LBS YR.</u>	<u>HES</u>	<u>NWW</u>

MANIFESTED

Have both listed and characteristic waste codes been assigned, where a listed waste exhibits a characteristic? 40 CFR 268.9

6) Does the facility handle any California List Wastes? (liquid hazardous waste with greater than 50 ppm PCB greater than 134 ppm nickel greater than 130 thallium, etc.)

7. List all wastes not listed above.

Waste	Process Generating Waste	Rate	Disposition
<u>CHROMS</u>	<u>SPILL CLEAN-UP -</u>	<u>—</u>	<u>—</u>
<u>SPECIAL</u>	<u>WASTES -</u>	<u>—</u>	<u>—</u>
<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>
<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>

- 8) If the company claims a reuse or reclaim exemption please include the following information:

	<u>Waste Type</u>	<u>Generation Rate</u>	<u>How reclaimed & by Who</u>	<u>Quantity stored on Site</u>
A.	_____	_____	_____	_____
B.	_____	_____	_____	_____

9) Hazardous Waste
On-Site

	<u>Amount</u>	<u>How Stored</u>	<u>Comments</u>
K048, 450, 51, 52 , D018 D001 - API	3-20,000 GAL CONTAINERS	LG. CONTAINERS	(TANKS VS. CONTAINERS)
API DEBRIS	2-55 GALLON DMS.	Drums	OPEN - NOT MARKED
UNKNOWN	55 gallons	Drum	
K050, 51	1-55 gallons	Drum	
K048, 49, 50, 51, D018	3-55 gallons	Drums	
PAINT WASTE (F003-5)	1-55 gallons	Drum	CONTRACTOR WASTE
_____	_____	_____	_____
_____	_____	_____	_____

- 10) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred)

(40 CFR 270.13)

(HWIMS 610)

NA

- 11) Is the Biennial Report Accurate? YES

- 12) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.)

SEE SPILL RPT.

LAND BAN TREATMENT STANDARDS

	HWIMS 700	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1) Does generator dilute prohibited wastes to meet treatment standard criteria, or render them nonhazardous, as a substitute for adequate treatment? <u>40 CFR 268.3</u>		—	—	—	✓
2) Do treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? <u>40 CFR 268.9</u>		✓	—	—	—
3) Does generator specify alternative treatment standards for lab packs or F039 leachate? If yes, see <u>40 CFR 268.42(c)(2)</u>		—	—	—	✓
4) Does generator mix wastes with different treatment standards for a constituent of concern? If yes, did generator select most stringent treatment standards?		✓	—	—	—
5) Does the generator handle any wastes with a LDR variance (national capacity, case-by-case, etc.)?		—	—	—	✓

ON-SITE TREATMENT

	HWIMS 700				
1) Does the generator treat wastes in 90-day tanks or containers? If no, go to next section.		—	—	—	✓
2) Does the generator treat the wastes to meet appropriate treatment standards?		—	—	—	✓
3) If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? <u>40 CFR 268.7(a)(4)</u>		—	—	—	✓
4) Does the plan fulfill the following:					
-Based on a detailed chemical and physical analysis of a representative sample		—	—	—	✓
-Contains information necessary to treat the wastes in accordance with LDR		—	—	—	✓
5) Has the plan been filed with the Regional Administrator or IDEM?		—	—	—	✓
6) Are characteristic wastes which have been rendered nonhazardous shipped to a Subtitle D facility?		—	—	—	✓
a. If yes, is a notification and a certification for each shipment sent to the Regional Administrator (prior to 2/24/92) or IDEM? <u>40 CFR 268.9(d)(1) and 268.7(b)(5)</u>		—	—	—	✓

STORAGE

(HWIMS)

OK DF NI NA

- 1) Has the capacity of the storage areas listed on the Part A or permit been equal to or less than that allow? List type and amount of any storage capacity overages? Citation?

— — — ✓

CLOSING WASTE PILE - NOT ON PART A

- 2) Are all containers clearly marked to identify the contents and date(s) entering storage or is such information available in the operating log?

40 CFR 268.50(a)(2)(i)

— — — ✓

- 3) Have wastes been stored for less than one year?

✓ — — —

- 4) If no, can the facility show that such storage is necessary to facilitate proper recovery, treatment, or disposal. 40 CFR 268.50(c)

— — — ✓

TREATMENT

(HWIMS)

- 1) Does the facility treat hazardous waste other than in 90-day tanks and containers? If no, go to next section.

— — — ✓

- 2) Are required technologies used to treat wastes which have treatment standards expressed as technologies? 40 CFR 268.40(b)

(HWIMS)

— — — —

- 3) Are alternative methods approved? 40 CFR 268.2

— — — —

- 4) Is the LDR treatment standard lower than the Characteristic level?

— — — —

- 5) If yes, does the facility manage the waste as restricted until treatment standards are met? 40 CFR 268.9

— — — —

- 6) Does the facility test residues from all treatment processes? 40 CFR 268.7

— — — —

- 13) Additional Comments:

General Facility Standards (paperwork)

		<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1)	Has the Regional Administrator/Environmental Management Board been notified regarding:				
a.	Receipt of hazardous waste from a foreign source? <u>40 CFR 265.12(a)</u> (HWIMS 300)	—	—	—	✓
b.	Facility expansion? <u>40 CFR 270.72(b)</u> (HWIMS 610)	—	—	—	✓
c.	Change of owner or operator? <u>40 CFR 265.12(b)</u> (HWIMS 300)	—	—	—	✓
<hr/>					
<hr/>					
<hr/>					
2)	<u>General Waste Analysis:</u> (HWIMS 310)				
	<i>NO WASTE ANALYSIS PLAN SINCE NOT ACTIVELY STORING WASTE</i>				
a.	Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing of knowledge of the process? <u>40 CFR 265.13(a)1</u>	—	—	—	✓
b.	Does the owner or operator have a detailed waste analysis plan on file at the facility? <u>40 CFR 265.13(b)</u>	—	—	—	✓
	Does the waste analysis plan contain:				
	1. parameters (and rationale for their choice)	—	—	—	—
	2. test methods	—	—	—	—
	3. sampling method for representative sample	—	—	—	—
	4. frequency of analysis (and rationale)	—	—	—	—
	5. <u>off-site only:</u> waste analysis from generators	—	—	—	—
	6. Additional waste analysis needed (when a change in waste type or process occurs)				
	a. <u>265.193 Tanks</u> (see above)	—	—	—	—
	b. <u>265.225 Impoundment</u> (same as above)	—	—	—	—
	c. <u>265.252 Waste Pile</u> (same as above)	—	—	—	—
	d. <u>265.273 Land Treatment</u> (same as above)	—	—	—	—
	e. <u>265.341 Incinerators</u> (same as above)	—	—	—	—

		<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
f.	<u>265.375 Thermal Treatment</u> (same as above)	—	—	—	—
g.	<u>265.402 Other Treatment</u> (same as above)	—	—	—	—

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?
40 CFR 265.13(c) — — — —

d. Is the waste analysis plan followed? —————

WASTE DETERMINATION PROGRAM

3) Owner or Operator Inspections: (HWIMS 320)

a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?
40 CFR 265.15(a) ✓ — — —

b. Does the owner or operator have an inspection schedule at the facility?
40 CFR 265.15(b)2 — ✓ — —

c. If so, does the schedule address the inspection of the following items:
40 CFR 265.15(b)1 No schedule

i.	monitoring equipment?	—	—	—	✓
ii.	safety and emergency equipment?	—	—	—	+
	<i>INSPECTION RECORDS AT SAFETY OFFICE</i>	—	—	—	
iii.	security devices (including fences)?	—	—	—	
iv.	operating and structural equipment (ie. dikes, pumps, etc.)?	—	—	—	
v.	type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)?	—	—	—	↓
	<u>40 CFR 265.15(b)(2)</u>	—	—	—	

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? <u>40 CFR 265.15(b)(4)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

vii. Must include:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| 1. Weekly container storage?
(See 265.174) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Daily and Weekly Tank Storage?
(See 265.194) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Daily freeboard and weekly dike inspection for surface impoundments?
(See 265.226) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely)
<u>[See 265.15(b)(4)]</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Does Owner or Operator follow the written inspection schedule as outlined?
<u>265.15(b)(1)</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Are areas subject to spills inspected daily when in use?
<u>265.15(b)(4)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?
<u>40 CFR 265.15(d)</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <i>INSPECTION OF CONTAINERS/EMERGENCY EQUIPMENT LOGGED AT SAFETY OFFICE</i> | | | | |
| g. Does the inspection log contain the following information:
<u>40 CFR 265.15(d)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i. the date and time of the inspection? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ii. the name of the inspector? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
iii. a notation of the observations made?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
iv. the date and nature of any repairs or remedial actions?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

PERSONNEL TRAINING RECORDS

1) Do personnel training records include: (HWIMS 330)

- | | | | | |
|---|----------|-----------|-----------|-----------|
| a. Job titles for the positions related to HWM
<u>40 CFR 265.16(d)1</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| b. The name of the employees filling each job title?
<u>40 CFR 265.16(d)(1)</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position?
<u>40 CFR 265.16(d)2</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator ✓ Training coordinator ✓ Emergency response personnel
 Inspectors Material handlers ✓ Container labelers ✓ Manifesters ✓
 Recordkeepers

- | | | | | |
|--|----------|-----------|-----------|-----------|
| d. Description of both introductory and continuing training required for each job?
<u>40 CFR 265.16(d)(3)</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
|--|----------|-----------|-----------|-----------|

Describe in general the type of training program in use at the facility.

- | | | | | |
|---|----------|-----------|-----------|-----------|
| e. Records of training required in (d)?
<u>40 CFR 265.16(d)4</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
|---|----------|-----------|-----------|-----------|

- f. Did facility personnel receive the required training including:

OK DF NI NA

i) classroom or on the job

☒ OK DF NI NA

ii) within 6 months of hire

☒ OK DF NI NA

iii) annual review of training?

☒ OK DF NI NA

- g. Are all training records maintained for current personnel and for at least three years for former employees?

☒ OK DF NI NA

40 CFR 265.16(e)

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(HWIMS 350)

- 1) Does the Contingency Plan contain the following information:

- a. The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).

☒ OK DF NI NA

- A. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services.

☒ OK DF NI NA

- i. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?

☒ OK DF NI NA

- ii. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

☒ OK DF NI NA

40 CFR 265.52(e)

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|---|-----------|-----------|-----------|-----------|
| iii. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) | — | — | — | — |
| 40 CFR 265.52(f) <i>DOESN'T DESCRIBE WHERE EMPLOYEES SHOULD STAGE.</i> | — | ✓ | — | — |
| 2) Emergency Coordinator: | | | | |
| a. Is the facility Emergency Coordinator identified? | — | — | — | — |
| 40 CFR 265.52(d) | — | — | — | — |
| b. Is coordinator familiar with all aspects of site operation and emergency procedures? | — | ✓ | — | — |
| 40 CFR 265.55 | — | — | — | — |
| c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? | — | ✓ | — | — |
| 40 CFR 265.55 | — | — | — | — |

PREPAREDNESS AND PREVENTION

- | | | | | |
|--|---|---|---|---|
| 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? | — | — | — | — |
| 40 CFR 265.37 (HWIMS 340) | — | — | — | — |
| 2) Are copies of the Contingency Plan available at the site and local emergency organizations? | — | — | — | — |
| 40 CFR 265.53 (HWIMS 350) | — | — | — | — |
| 3) Emergency Procedures | | | | |
| If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 40 CFR 265.56 (329 IAC 3-18-7)? | — | — | — | — |
| (HWIMS 350) | — | — | — | ✓ |

*RECENT SPILL ONLY INVOLVED OIL FROM CRUDE SLOP OIL -
 WW SKIMMED OIL (AREA 2 SLOP OIL TANK)
 (NOT HAZARDOUS WASTE)*

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

1)	Use of Manifest System:	(HWIMS 360)	OK	DF	NI	NA
a.	Does the facility follow the procedures listed in 265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)					NO WASTE FROM OFF-SITE
b.	Are records of past shipments retained for three (3) years? 40 CFR 265.71(b)5					
2)	Has the facility submitted copies of hazardous waste manifests to the Department within five (5) working days after receiving hazardous waste? (This requirements applies to both Indiana's and other states hazardous waste manifests)?					
3)	Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.72					
4)	Unmanifested Waste Reports: (applies only to Off-site facilities)					
a.	Has the facility accepted any hazardous waste from an off-site generator subject to 329 IAC 3.1-7-3 (3-8-1) without a manifest or shipping paper? 40 CFR 265.76					
b.	If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.					
c.	Has the facility submitted an unmanifested waste report within 15 days after receiving the waste?					
<hr/>						
5)	Closure/Post Closure					
a.	Is the closure plan available for inspection? 40 CFR 265.112(a) (HWIMS 390)		✓			
b.	Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a) (HWIMS 390)					✓
c.	Has the closure cost and post closure cost estimate been revised annually to account for inflation. (329 IAC 3.1-14-3) (HWIMS 400)		✓			

6) Operating Record:

(HWIMS 370)

OK DF NI NA

- a. Does owner or operator have a operating record?
 40 CFR 265.73(a) ALTHOUGH NO DOCUMENT LABELLED OPERATING RECORD - OWNER/OPERATOR DOES KEEP APPLICABLE RECORDS. ✓
- b. Does the owner or operator maintain an operating record that contains the following information?

- i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (including tanks)?
40 CFR 265.73(b)(1)

NOT ACTIVELY
STORING WASTE ✓

Summarize how the facility tracks the method and date of TSD activity.

- ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.)
40 CFR 265.73(b)(2)

Summarize how the facility tracks the location and quantity of waste.

- iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.)
40 CFR 265.73(b)(2)

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections?
40 CFR 265.73(b)(3)(5)(6) ✓

- v. Reports detailing all incidents that required implementation of the Contingency Plan?
40 CFR 265.73(b)(4) ✓

- vi. All closure and post closure costs as applicable?
40 CFR 265.73(b)(7) ✓

vii. Copies of LDR notifications and certifications?

40 CFR 265.73 b (11)(13)(15)

SEE LDR SECTION

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- | | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|----|--|-----------|-----------|-----------|-----------|
| 1) | Has the owner or operator of the facility implemented a groundwater monitoring system?
<u>40 CFR 265.90(a) 3 WELLS AT (HWIMS 380)</u> | — | — | — | ✓ |
| 2) | <u>GOAT HILL FOR CLOSURE CERTIFICATION</u>
Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in <u>265.90(d)?</u> (HWIMS 380) | — | — | — | ✓ |

NO ACTUAL RCRA 40 CFR 265.90 SYSTEM IS IN PLACE - SYSTEM IN PLACE IS ONLY TO SHOW CLEAN CLOSURE FOR WASTE PILE.

6) Operating Record:

(HWIMS 370)

OK DF NI NA

- a. Does owner or operator have a operating record?
40 CFR 265.73(a) *ALTHOUGH NO DOCUMENT LABELLED* ✓
- b. Does the owner or operator maintain an operating record that contains the following information? *OPERATING RECORD - OWNER/OPERATOR DOES KEEP APPLICABLE RECORDS.*

- i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (including tanks)?
40 CFR 265.73(b)(1)

Summarize how the facility tracks the method and date of TSD activity.

- ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.)
40 CFR 265.73(b)(2)

Summarize how the facility tracks the location and quantity of waste.

- iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.)
40 CFR 265.73(b)(2)

- iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections?
40 CFR 265.73(b)(3)(5)(6)

- v. Reports detailing all incidents that required implementation of the Contingency Plan?
40 CFR 265.73(b)(4)

- vi. All closure and post closure costs as applicable?
40 CFR 265.73(b)(7)

vii. Copies of LDR notifications and
certifications?
40 CFR 265.73 b (11)(13)(15)

SEE LDR SECTION

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- | | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|----|---|-----------|-----------|-----------|-----------|
| 1) | Has the owner or operator of the facility implemented a groundwater monitoring system?
<u>40 CFR 265.90(a)</u> <u>3 WELLS AT</u> (HWIMS 380) | — | — | — | ✓ |
| 2) | <u>GOAT HILL FOR CLOSURE CERTIFICATION</u>
Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in <u>265.90(d)</u> ? (HWIMS 380) | — | — | — | ✓ |

NO ACTUAL RCRA 40 CFR 265.90 SYSTEM IS IN
PLACE - SYSTEM IN PLACE IS ONLY TO SHOW CLEAN
CLOSURE FOR WASTE PILE.

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

<u>Manifest Requirements:</u>	<u>(HWIMS 110)</u>	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1) Does the operator have copies of the manifest available for review? <u>40 CFR 262.40 (329 IAC 3.1-7-6)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period				<u>~ 84</u>	
3) Do the manifest forms examined contain the following information. <u>40 CFR 262.21 (329 IAC 3.1-7-8)</u>					
a. Manifest document number? EPA ID No. + Unique 5 digit No.? (five digit unique number)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Name, telephone number (3.1-7-11) and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Name, Address, telephone number (3.1-7-11) and EPA ID Number of designated permitted facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. EPA hazardous waste numbers (3.1-7-11)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Handling Codes (3.1-7-11)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k. Additional waste numbers included in box J.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-------------|
| 4) For hazardous waste shipments to Indiana facilities (or hazardous waste shipments to states that do not supply manifests) has the generator used the Indiana Hazardous Waste Manifest?
<u>329 IAC 3.1-7-4</u> | ✓ | — | — | — |
| 5) Has the generator submitted copies of hazardous waste manifests to the Department within five (5) working days after shipping hazardous waste? (This requirement applies to both Indiana's and other states hazardous waste manifests).
<u>329 IAC 3.1-7-6</u> | ✓ | — | — | — |
| 6) Reportable exceptions:
<u>40 CFR 262.42</u> | | | | |
| | | | | (HWIMS 180) |
| a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>NONE</u> | | | | |
| b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Commissioner. <u>NA</u> | | | | |

INTERNATIONAL SHIPMENTS:

(HWIMS 190)

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|---|-----------|-----------|-----------|-----------|
| 1) Has the installation imported or exported hazardous waste?
<u>40 CFR 262.50</u>
(If answered Yes, complete the following as applicable.) | — | — | — | ✓ |
| a. Exporting hazardous waste; has a generator: | | | | |
| i. Notified the administrator and OSHWM/IDEM in writing? | — | — | — | — |
| ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? | — | — | — | — |
| iii. Met the Manifest requirements? | — | — | — | — |
| b. Importing hazardous waste; has the generator met the manifest requirements? | — | — | — | — |

LAND BAN NOTIFICATION REQUIREMENTS

(HWIMS 700)

OK DF NI NA

- 1) Does the operator have copies of LDR notifications available for review: 40 CFR 268.7
- 2) Does the operator provide a notification to the TSD facility with each shipment, even if waste meets treatment standards? 40 CFR 268.7
- 3) Does the notification include the following: (if possible, make copies of, or record information from notification(s) that do not contain the necessary information) 40 CFR 268.7
- a. EPA hazardous waste number
- b. Treatment standards (for wastes other than F001-F005 and F039, treatment standards may be referenced by including sub-category, treatability group, and CFR sections and paragraph where treatment standards appear)
- c. Where treatment standards is specified technology, applicable five-letter treatment code?
- d. Manifest number
- e. If the waste meets treatment standards, or if alternate treatment standards for lab packs are specified, does it have proper certification statement?
- f. Waste analysis data, if available.
- 4) Has the generator retained on-site a copy of all notices, certifications, and other documentation produced pursuant to 268.7 for at least five (5) years? 268.7(a)(7)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RECORDKEEPING AND REPORTING

- 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility, including correct LDR treatability group and treatment standard?
40 CFR 262.11 and 40 CFR 268.2

(HWIMS 100)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	--------------------------	--------------------------	--------------------------

- a. If DF, list below:

Assigned Classification

Correct Classification

b. Which of the following methods does the generator employ for waste determination?

a) Knowledge of waste.

b) Analysis. Specify _____

2) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?

40 CFR 262.40

(HWIMS 180)

OK DF NI NA

✓

3) Has the generator submitted biennial reports as required? 329 IAC 3.1-7-14)

(HWIMS 180)

✓

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

SEE TRIP REPORT

Remember to take photos and document as well as possible all violations!!!

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit CONTRACTOR PAINT AREA

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|---|-----------|-----------|-----------|-----------|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
<u>40 CFR 262.30-262.32</u> | — | — | — | — ✓ |
| <hr/> | | | | |
| 2) Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34</u> | — ✓ | — | — | — |
| 3) Have more than 90 days elapsed since the date inspected in (2)?
<u>40 CFR 262.34</u> | — ✓ | — | — | — |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34</u> | — ✓ | — | — | — |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34</u> | — ✓ | — | — | — |

1-55 gallon drum of F003, F005 CONTRACTOR
PAINT WASTE

Satellite Accumulation
(HWIMS 120)

- | | | | | |
|--|---|---|---|-----|
| 1) Are containers marked with the words "Hazardous Waste" or with other <u>words</u> identifying the contents?
<u>40 CFR 262.34</u> | — | — | — | — ✓ |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
<u>40 CFR 262.34</u> | — | — | — | — ✓ |

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit FACILITY ACCUMULATION AREA (NORTH)

- | | OK | DF | NI | NA |
|---|---|----|----|----|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
<u>40 CFR 262.30-262.32</u> | — | — | — | ✓ |
| <hr/> | | | | |
| 2) Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34</u> | 2-55 gallon drums marked ✓
(K049, 50, 48, 51, D001, D01) | | | |
| 3) Have more than 90 days elapsed since the date inspected in (2)?
<u>40 CFR 262.34</u> | FOR ALL
✓ WASTES MARK | | | |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34</u> | (LARGE MOVABLE CONTAINERS)
✓ | | | |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34</u> | 2-55 gallon drums not marked.
✓ | | | |

Satellite Accumulation
(HWIMS 120)

- | | | | | |
|---|---|---|---|---|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
<u>40 CFR 262.34</u> | — | — | — | ✓ |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
<u>40 CFR 262.34</u> | — | — | — | ✓ |

Use and Management of Containers

Location of Unit MARATHON (NORTH) AREA

PAINT - CONTRACTOR AREA OK DF NI NA

- | | | | | |
|--|---|-----------|-----------|-----------|
| 1) Are containers in good condition? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 2) Are containers compatible with waste in them? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 3) Are containers managed to prevent leaks? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 4) Are containers stored closed? | <u> </u> | <u>✓</u> | <u> </u> | <u> </u> |
| 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). | <u>2 - 55 gallon API WASTE DMS - OPEN</u>
<u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) | <u> </u> | <u> </u> | <u> </u> | <u>✓</u> |
| 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | <u> </u> | <u> </u> | <u> </u> | <u>✓</u> |
| 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? | <u> </u> | <u> </u> | <u> </u> | <u>✓</u> |
| a. Special handling? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| b. No Smoking signs? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| c. Separation and protection from ignition sources? | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| 9) Does the container storage area have adequate aisle space (about 2.5 feet)? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |

Preparedness and Prevention:

- | | | | | |
|--|-----------|-----------|-----------|-----------|
| 11) Security - Do security measures include: | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| a. 24- hour surveillance? or <u>PLANT</u> | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| b. Barrier around facility including controlled entry? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| c. Danger sign(s) at entrance? | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| 12) Maintenance and Operation of Facility | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | <u> </u> | <u> </u> | <u> </u> | <u>✓</u> |
| 13) If required, does the facility have the following equipment: | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| a. Internal communications or alarm systems? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| b. Telephone or 2-way radios at the scene of operations? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |

- 14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?

✓ _ _ _

Testing and Maintenance of Emergency Equipment

- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
b. Is emergency equipment in operable condition?

✓
_ _ _
_ _ _

- 16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)

✓
_ _ _

*TSD's Only

check for comments on back!

Appendix C
Hazardous Waste Burned for Energy Recovery

40 CFR 266, Subpart D
329 IAC 3.1-11-1

Section I. is for marketers and Section II. for burners
(HWIMS 500)

I. Marketers

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|---|-----------|-----------|---------------------------------|-----------|
| 1) Has this facility notified as a Marketer?
<u>40 CFR 266.34(b)</u> | ✓ | (4-3-91) | | |
| 2) Is the hazardous waste fuel stored as a hazardous waste? <u>40 CFR 266.34(c)</u> | ✓ | | | |
| 3) Is the hazardous waste fuel shipped offsite in compliance with the Standards for Generators in 40 CFR 262?
<u>40 CFR 266.34(d)</u> | ✓ | | | |
| 4) Has the marketer obtained a one-time certification from the burner or other marketer that; | | | | |
| a. The burner or marketer has notified of their waste as fuel activities? <u>40 CFR 266.34(e)(1)(i)</u> | | | | |
| b. If the recipient is a burner that the waste will be burned only in approved industrial furnaces or boilers (See 266.31(a)(2)b)?
<u>40 CFR 266.34(e)(1)(ii)</u> | | ✓ | NOT FOR
PATCH M
(Co-play) | |
| 5) Has the marketer provided a one-time certification that he has notified of his waste as fuel activity prior to his first shipment of fuel to that another marketer? <u>40 CFR 266.34(e)(2)</u> | | | | ✓ |
| 6) Are all certifications received or sent by the marketer maintained at the site for at least three (3) years? <u>40 CFR 266.34(f)</u> | | | | ✓ |

Comments:

II. Burners

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|---|-----------|-----------|-----------|-----------|
| 1) Has this facility notified as a Burner?
<u>40 CFR 266.35(b)</u> | — | — | — | ✓ |
| 2) Is the hazardous waste fuel managed in compliance
with 40 CFR 265/40 CFR 264 (existing/new storage
facilities) or 40 CFR 262.34 (generators who burn
on-site)? <u>40 CFR 266.35(c)(1) and (2)</u> | — | — | — | — |
| 3) Has the burner provided the marketer with a certification
that he has notified of waste as fuel activites and
that he will burn only in approved furnaces or
boilers? <u>40 CFR 266.35(d)</u> | — | — | — | — |
| 4) Are certification forms provided to marketers maintained
on file for at least three (3) years?
<u>40 CFR 266.35(e)</u> | — | — | — | — |

Comments:

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: 4/22/92
4/23/92

BY: ROBERT MALONE

COMPANY: Marathon Oil Company

LOCATION: 5000 West 86th STREET

I.D.#: IND/006/417/430

Type of inspection G---T---TSD---Closure---Complaint---Other(please specify)

A. GENERAL

	YES	NO	NA
1. FEDERAL NOTIFICATION ON FILE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. FEDERAL PART A ON FILE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. CLOSURE PLAN REVIEWED?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. CONTINGENCY PLAN REVIEWED?	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. BIENNIAL REPORT REVIEWED?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
*6. PART B PERMIT REVIEWED?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*(Note any Special Permit Conditions)
Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

GENERATOR- K049, K050, K051, K052

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

DOOG (Hazardous Waste Solid) CWM- FT. WAYN

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

CLEAN-UP MATERIALS

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

NA

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	<u>Code</u>	<u>Amount</u>	<u>Unit of Measure</u>
1.	<u> </u>	<u> </u>	<u> </u>
2.	<u> </u>	<u> </u>	<u> </u>
3.	<u> </u>	<u> </u>	<u> </u>
4.	<u> </u>	<u> </u>	<u> </u>
5.	<u> </u>	<u> </u>	<u> </u>

Are there any discrepancies regarding multiple Part A submittals?

G. CLOSURE/POST CLOSURE

1. Any Closed Units: If yes, describe:

HAZARDOUS WASTE PILE CLOSING - FACILITY CERTIFIED
CLOSURE/AWAITING APPROVAL

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

<u>Date of inspection</u>	<u>Action type</u>	<u>Date of Action</u>
<u>12/11+12/90</u>	<u>VL</u>	<u>4-5-91</u>
<u>12/28/89</u>	<u>NO ACTION ISSUED</u>	

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

CLOSURE OF GOAT HILL WASTE PILE.

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

CONTAINERS NOT INSPECTED WEEKLY, TANK INSPECTIONS, TRAINING RECORD
DEFICIENCIES, CP - EMERGENCY EQUIP LIST, CONTAINER STORAGE
VIOLATIONS, TANK ASSESSMENT-OVERFILL CONTROLS DEF, LACK WASTE

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR
NEED FIELD VERIFIED

CLOSURE ON WASTE PILE PHYSICALLY COMPLETED, SENT
IN CERTIFICATION - AWAITING STATE RESPONSE.

L. COMMENTS

FACILITY IS ACTING AS GENERATOR ONLY -
WILL INSPECT ON THAT BASIS.

CAR

TSD - RCRA INSPECTION REPORT

EPA ID # IND 000641730 NAME MARATHON PETROLEUM CO.

MAILING ADDRESS: P.O. BOX 68007

LOCATION ADDRESS: 5000 WEST 86TH STREET

INDIANAPOLIS, INDIANA 46268-0007

CONTACT: MS. PAT SORENSEN PHONE: 317/872-3200

OWNERSHIP: MARATHON PETROLEUM COUNTY: MARION

STATUS CODE: 1 1=Active 3=Dead Mail 4=PCB handler
6=non-handler 2=Obsolete ID # 9=Superfund site
5=Out of business

ACTIVITY: (This should reflect the actual functioning of the facility)

LQG ☒ SQG ☐ CEG ☐ TRANSPORTER ☐ TSD ☐ UI ☐

TRANSPORTERS: Air ☐ Rail ☐ Hwy ☐ Water ☐ Other ☐

HAZARDOUS WASTE FUEL : Gen mktg burner ☒ other mktr ☐ burner ☐
OFF SPEC USED OIL FUEL : Gen mktg burner ☐ other mktr ☐ burner ☐
SPEC USED OIL FUEL MKTR : ☐
BURNING DEVISE : Util boiler ☐ Indus boiler ☐ Indus furn ☐

Person(s) interviewed:	Title:	Telephone:
<u>MS. PAT SORENSEN</u>	<u>ENVIRONMENTAL MANAGER</u>	<u>317/872-3200</u>
<u>MR. ED SPOELKER</u>	<u>ENVIRONMENTAL ENGINEER</u>	<u>" " "</u>
Inspector(s):	Agency:	Telephone:
<u>BRUCE KIZER</u>	<u>IDEM</u>	<u>317/232-4537</u>

Date of inspection: 12/11 & 12/12 1990 Time of inspection: 9am - 4pm



Installation Processes by Process Code (EPA Form 3510-3) 9/16/86

S01 <input type="checkbox"/> Container storage	T03 <input checked="" type="checkbox"/> Incinerator treatment
S02 <input checked="" type="checkbox"/> Tank storage	T04 <input checked="" type="checkbox"/> Other treatment
S03 <input type="checkbox"/> Waste pile storage	D79 <input type="checkbox"/> Injection well disposal
S04 <input type="checkbox"/> Surface impoundment storage	D80 <input type="checkbox"/> Landfill disposal
T01 <input checked="" type="checkbox"/> Tank treatment	D81 <input checked="" type="checkbox"/> Land application disposal
T02 <input type="checkbox"/> Surface impoundment treatment	D83 <input type="checkbox"/> Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

- 1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application. (HWIMS 610)
~~XXXXX~~ S03 - PROCEEDING WITH CLOSURE
- 2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.
ALL ABOVE CODES ADDRESSED DURING PREVIOUS INSPECTIONS.
- 3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or non-hazardous)!

50,000 BARRELS/DAY CRUDE OIL REFINERY. HAZARDOUS
WASTE GENERATED FROM API SEPARATORS, SLOP OIL, AND
STORAGE OF LEADED GASOLINE.

- 4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

	<u>YES</u>	<u>NO</u>
A) Waste Oil Fuel - Appendix A	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Lead Acid Batteries - Appendix B	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Hazardous Waste Fuel - Appendix C	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D) Precious Metals - Appendix D	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E) Use Constituting Disposal - Appendix E	<input type="checkbox"/>	<input checked="" type="checkbox"/>
F) Tanks	<input checked="" type="checkbox"/>	<input type="checkbox"/>
G) Use and Management of Containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5) Hazardous Waste
Streams/EPA #

* bundle cleaning waste drained to APII

Waste	Process Generating Waste	Rate	Disposition
OIL CONTAMINATEDS	FLY ASH		NO CURRENT DISPOSAL APPROVALS
JETS FUEL TREATER	CLAY		
NON-HAZ. TANK BOTTOMS			

- 7) If the company claims a reuse or reclaim exemption please include the following information:

	<u>Waste Type</u>	<u>Generation Rate</u>	<u>How reclaimed & by Who</u>	<u>Quantity stored on Site</u>
A.	_____	_____	_____	_____
B.	_____	_____	_____	_____

8) Hazardous Waste
On-Site

	<u>Amount</u>	<u>How Stored</u>	<u>Comments</u>
<u>K049, K050, K051</u>	<u>9,000 gal</u>	<u>TANK</u>	<u>EXTERIOR RUSTED</u>
<u>F003/D001</u>	<u>3 drums</u>	<u>55 gal drums</u>	
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

- 9) Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.
329 IAC 3-38-2 (HWIMS 610)

NA

- 10) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred)
(40 CFR 270.13 and 329 IAC 3-34-4) (HWIMS 610)

NA

- 11) Is the Biennial Report Accurate? ✓

- 12) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.)

Spillage of oil near West API separator.

13) Additional Comments:

MARATHON PETROLEUM Co. (MPC) utilizes two contractors which manage hazardous waste. North American Construction Co., 770 Pineview Dr., Zionsville, IND 981091812, is responsible for the management of the API separators and bundle cleaning which generates K-listed wastes. LARK Painting, Terre Haute, non-notifier, manages wastes generated from routine painting at MPC.

Under the federal Consent Agreement and Final Order (CAFO) V-W-88-R-038, MPC must close the "goat hill" waste pile and comply with generator standards. All waste and contaminated soil have been removed from the goat hill area. MPC is awaiting review of the proposed groundwater portion of the closure. Based on the federal CAFO, MPC was inspected for generator standards.

General Facility Standards (paperwork)

- | | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|----|---|-----------|-----------|-----------|-----------|
| 1) | Has the Regional Administrator/Environmental Management Board been notified regarding: | | | | |
| a. | Receipt of hazardous waste from a foreign source?
<u>40 CFR 265.12(a) (329 IAC 3-16-3) (HWIMS 300)</u> | — | — | — | ✓ |
| b. | Facility expansion?
<u>40 CFR 270.72(b) (329 IAC 3-38-3) (HWIMS 610)</u> | — | — | — | ✓ |
| c. | Change of owner or operator?
<u>40 CFR 265.12(b) (329 IAC 3-16-3) (HWIMS 300)</u> | ① ✓ | — | — | — |

① From Rock Island to MPC.

2) General Waste Analysis: (HWIMS 310)

- | | | | | | |
|----|---|---|---|---|---|
| a. | Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing or knowledge of the process?
<u>40 CFR 265.13(a) (329 IAC 3-16-4)</u> | — | — | — | ✓ |
| b. | Does the owner or operator have a detailed waste analysis plan on file at the facility?
<u>40 CFR 265.13(b) (329 IAC 3-16-4)</u> | — | — | — | — |
| | Does the waste analysis plan contain: | | | | |
| | 1. parameters (and rationale for their choice) | — | — | — | — |
| | 2. test methods | — | — | — | — |
| | 3. sampling method for representative sample | — | — | — | — |
| | 4. frequency of analysis (and rationale) | — | — | — | — |
| | 5. <u>off-site only:</u> waste analysis from generators | — | — | — | — |
| | 6. Additional waste analysis needed (when a change in waste type or process occurs) | — | — | — | — |
| a. | <u>265.193 (329 IAC 3-24-3) Tanks</u>
(see above) | — | — | — | — |
| b. | <u>265.225 (329 IAC 3-25-4) Impoundment</u>
(same as above) | — | — | — | — |
| c. | <u>265.252 (329 IAC 3-26-3) Waste Pile</u>
(same as above) | — | — | — | — |
| d. | <u>265.273 (329 IAC 3-27-3) Land Treatment</u>
(same as above) | — | — | — | — |
| e. | <u>265.341 (329 IAC 3-29-2) Incinerators</u>
(same as above) | — | — | — | — |

		OK	DF	NI	NA
f.	<u>265.375 (329 IAC 3-30-3) Thermal Treatment</u> (same as above)	—	—	—	✓
g.	<u>265.402 (329 IAC 3-31-3) Other Treatment</u> (same as above)	—	—	—	✓

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?
40 CFR 265.13(c) (329 IAC 3-16-4)
— — — ✓

d. Is the waste analysis plan followed? _____

3) Owner or Operator Inspections: (HWIMS 320)

a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?
40 CFR 265.15(a) (329 IAC 3-16-6)
— ✓ — —

b. Does the owner or operator have an inspection schedule at the facility?
40 CFR 265.15(b)2 (329 IAC 3-16-6)
— — — ✓

c. If so, does the schedule address the inspection of the following items:
40 CFR 265.15(b)1 (329 IAC 3-16-6)

i. monitoring equipment? — — — —

ii. safety and emergency equipment? — — — —

iii. security devices (including fences)? — — — —

iv. operating and structural equipment (ie. dikes, pumps, etc.)? — — — —

v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)?
40 CFR 265.15(b)(2) (329 IAC 3-16-6)
— — — —

	OK	DF	NI	NA
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? <u>40 CFR 265.15(b)(4) (329 IAC 3-16-6)</u>	—	—	—	✓

vii. Must include:

- | | | | | |
|---|---|-----|---|---|
| 1. Weekly container storage?
(See 265.174) (329 IAC 3-23-5) | ✓ | — | — | — |
| 2. Daily and Weekly Tank Storage?
(See 265.194) (329 IAC 3-24-4) | — | ③ ✓ | — | — |
| 3. Daily freeboard and weekly dike inspection for surface impoundments?
(See 265.226) (329 IAC 3-25-5) | — | — | — | ✓ |
| 4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely)
[See 265.15(b)(4) (329 IAC 3-16-6)] | — | — | — | ✓ |

d. Does Owner or Operator follow the written inspection schedule as outlined? <u>265.15(b)(1) (329 IAC 3-16-6)</u>	—	—	—	✓
---	---	---	---	---

e. Are areas subject to spills inspected daily when in use? <u>265.15(b)(4) (329 IAC 3-16-6)</u>	—	① ✓	—	—
---	---	-----	---	---

① Inspector: do not include the paint waste accumulation areas as shown on the map #1 & #2 ② SEE TANK CHECKLIST.

f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? <u>40 CFR 265.15(d) (329 IAC 3-16-6)</u>	✓	—	—	—
---	---	---	---	---

g. Does the inspection log contain the following information: <u>40 CFR 265.15(d) (329 IAC 3-16-6)</u>				
---	--	--	--	--

i. the date and time of the inspection?	✓	—	—	—
---	---	---	---	---

ii. the name of the inspector?	✓	—	—	—
--------------------------------	---	---	---	---

OK DF NI NA

iii. a notation of the observations made?

✓ — — —

iv. the date and nature of any repairs or remedial actions?

✓ — — —

4) Do personnel training records include: (HWIMS 330)

a. Job titles for the positions related to HWM
40 CFR 265.16(d)1 (329 IAC 3-16-7)

— 01 — —

b. The name of the employees filling each job title?
40 CFR 265.16(d)(1) (329 IAC 3-16-7)

— 01 — —

c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position?
40 CFR 265.16(d)2 (329 IAC 3-16-7)

— 01 — —

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator ✓ Training coordinator ✓ Emergency response personnel ✓
Inspectors ✓ Material handlers ✓ Container labelers ✓ Manifesters ✓
Recordkeepers ✓

d. Description of both introductory and continuing training required for each job?
40 CFR 265.16(d)(3) (329 IAC 3-16-7)

✓ — — —

Describe in general the type of training program in use at the facility.

③ MPC Lacked Training records for contractors managing haz. waste.
Lock Printing - Mr. MARK MANLY & Mr. Bill Maxwell. WACC -
Mr. EMMETT WEBB & Mr. Kim DREAMIA & Mr. PAT McPEAK All MPC

e. Records of training required in (d)?
40 CFR 265.16(d)4 (329 IAC 3-16-7)

— 01 — —

Personnel listed as emergency coordinators did not receive training
see attachments A & B.

f. Did facility personnel receive the required training including:

OK DF NI NA

i) classroom or on the job

3 ✓

ii) within 6 months of hire

✓

iii) annual review of training?

✓

g. Are all training records maintained for current personnel and for at least three years for former employees?

✓

40 CFR 265.16(e) [329 IAC 3-16-7(e)]

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(HWIMS 350)

1) Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with 265.51 (3-18-2) and 265.56 (3-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable). ✓

A. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. 329 IAC 3-18-3 ✓

i. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators? ✓

ii. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? ④ ✓
40 CFR 265.52(e) (329 IAC 3-18-3)

④ Lacked location of personal safety equipment.

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
iii. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) <u>40 CFR 265.52(f) (329 IAC 3-18-3)</u>	<u>✓</u>	—	—	—

2) Emergency Coordinator:

a. Is the facility Emergency Coordinator identified? <u>40 CFR 265.52(d) (329 IAC 3-18-3)</u>	<u>✓</u>	—	—	—
b. Is coordinator familiar with all aspects of site operation and emergency procedures? <u>40 CFR 265.55 (329 IAC 3-18-6)</u>	<u>✓</u>	—	—	—
c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? <u>40 CFR 265.55 (329 IAC 3-18-6)</u>	<u>✓</u>	—	—	—

Preparedness and Prevention

1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? <u>40 CFR 265.37 (329 IAC 3-17-7)</u> (HWIMS 340)	<u>✓</u>	—	—	—
2) Are copies of the Contingency Plan available at the site and local emergency organizations? <u>40 CFR 265.53 (329 IAC 3-18-4)</u> (HWIMS 350)	<u>✓</u>	—	—	—
3) Emergency Procedures If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in <u>265.56 (329 IAC 3-18-7)</u> ? (HWIMS 350)	—	—	—	<u>✓</u>

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

		<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1)	Use of Manifest System: (HWIMS 360)				
a.	Does the facility follow the procedures listed in 265.71 (3-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	—	—	—	✓
b.	Are records of past shipments retained for three (3) years? <u>40 CFR 265.71(b)5 (329 IAC 3-19-2)</u>	—	—	—	✓
2)	Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) <u>40 CFR 265.72 (329 IAC 3-19-3)</u>	—	—	—	✓
3)	Unmanifested Waste Reports: (applies only to Off-site facilities)				
a.	Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (3-8-1) without a manifest or shipping paper? <u>40 CFR 265.76 (329 IAC 3-19-7)</u>	—	—	—	✓
b.	If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.	—	—	—	✓
c.	Has the facility submitted 8700-13B (unmanifested waste report)?	—	—	—	✓
<hr/>					
<hr/>					
<hr/>					
4)	Closure/Post Closure				
a.	Is the closure plan available for inspection? <u>40 CFR 265.112(a) (329 IAC 3-21-3) (HWIMS 390)</u>	✓	—	—	—
b.	Is the post-closure plan available for inspection? (for disposal facilities only) <u>40 CFR 265.118(a) (329 IAC 3-21-8) (HWIMS 390)</u>	—	—	—	✓
c.	Has the closure cost and post closure cost estimate been revised annually to account for inflation. (HWIMS 400)	✓	—	—	—

- | | | OK | DF | NI | NA |
|----|---|----|----|----|----|
| 5) | Operating Record: (HWIMS 370) | | | | |
| a. | Does owner or operator have a operating record?
<u>40 CFR 265.73(a)</u> | — | — | — | ✓ |
| b. | Does the owner or operator maintain an operating record that contains the following information? | | | | |
| i. | The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (329 IAC 3-32-2)?
<u>40 CFR 265.73(b)(1) (329 IAC 3-19-4)</u> | — | — | — | ✓ |

Summarize how the facility tracks the method and date of TSD activity.

- | | | | | | |
|-----|--|---|---|---|---|
| ii. | The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.)
<u>40 CFR 265.73(b)(2) (329 IAC 3-19-4)</u> | — | — | — | ✓ |
|-----|--|---|---|---|---|

Summarize how the facility tracks the location and quantity of waste.

- | | | | | | |
|------|---|---|---|---|---|
| iii. | A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.)
<u>40 CFR 265.73(b)(2) (329 IAC 3-19-4)</u> | — | — | — | ✓ |
| iv. | Records and results of all waste analyses, trial tests, monitoring data, and operating inspections?
<u>40 CFR 265.73(b)(3)(5)(6) (329 IAC 3-19-4)</u> | — | — | — | ✓ |
| v. | Reports detailing all incidents that required implementation of the Contingency Plan?
<u>40 CFR 265.73(b)(4) (329 IAC 3-19-4)</u> | — | — | — | ✓ |
| vi. | All closure and post closure costs as applicable?
<u>40 CFR 265.73(b)(7) (329 IAC 3-19-4)</u> | ✓ | — | — | — |

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- | | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|----|---|-----------|------------|-----------|-----------|
| 1) | Has the owner or operator of the facility implemented a groundwater monitoring system?
<u>40 CFR 265.90(a) (329 IAC 3-20-1)</u> (HWIMS 380) | | <u>✓NO</u> | | |
| 2) | Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in <u>265.90(d) (329 IAC 3-20-1)?</u> (HWIMS 380) | | <u>✓NO</u> | | |

Groundwater plan under review by IDEM Technical staff
for closure of "goat hill" waste pile.

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

<u>Manifest Requirements:</u>	(HWIMS 110)	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1) Does the operator have copies of the manifest available for review? <u>40 CFR 262.40 (329 IAC 3-10-1)</u>		✓	—	—	—
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period				~90	
3) Do the manifest forms examined contain the following information. <u>40 CFR 262.21 (329 IAC 3-8-1)</u>					
a. Manifest document number? EPA ID No. + Unique 5 digit No.? (A sequential number for all manifests before September 20, 1984, and a five digit unique number after September 20, 1984.)		✓	—	—	—
b. Name, mailing address, telephone number, and EPA ID number of generator?		✓	—	—	—
c. Name, telephone number (3-14-3) and EPA ID Number of Transporter(s)?		✓	—	—	—
d. Name, Address, telephone number (3-14-3) and EPA ID Number of designated permitted facility?		✓	—	—	—
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?		✓	—	—	—
f. The total quantity of waste(s) and the type and number of containers loaded?		✓	—	—	—
g. Required certification?		✓	—	—	—
h. Required signatures?		✓	—	—	—
i. EPA hazardous waste number (3-14-3)?		✓	—	—	—
<hr/>					
<hr/>					
<hr/>					

4) Reportable exceptions:
40 CFR 262.42 (329 IAC 3-10-3) (HWIMS 180)

- a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. 0
- b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (329 IAC 3-10-3) to the Regional Administrator.
- _____
- _____
- _____

INTERNATIONAL SHIPMENTS:

(HWIMS 190)

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) Has the installation imported or exported hazardous waste?
<u>40 CFR 262.50 (329 IAC 3-11-1)</u>
(If answered Yes, complete the following as applicable.) | <u>NO</u> | _____ | _____ | _____ |
| a. Exporting hazardous waste; has a generator: | | | | |
| i. Notified the administrator in writing? | _____ | _____ | _____ | _____ |
| ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? | _____ | _____ | _____ | _____ |
| iii. Met the Manifest requirements? | _____ | _____ | _____ | _____ |
| b. Importing hazardous waste; has the generator met the manifest requirements? | _____ | _____ | _____ | _____ |
- _____
- _____

RECORDKEEPING AND REPORTING:

- 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility?
40 CFR 262.11 (329 IAC 3-7-2) (HWIMS 100) ✓ _____

- | | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|-------|---|-----------|-----------|-----------|-----------|
| 2) | Has the generator submitted biennial reports and exception reports as required?
<u>329 IAC 3-10-2 and 329 IAC 3-10-3</u> (HWIMS 180/360) | <u>✓</u> | — | — | — |
| 3) | Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
<u>40 CFR 262.40 (329 IAC 3-10-1)</u> (HWIMS 180) | <u>✓</u> | — | — | — |
| <hr/> | | | | | |
| <hr/> | | | | | |
| <hr/> | | | | | |

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

SEE PAGE
19

Remember to take photos and document as well as possible all violations!!!

5015S
kaw
1/31/89

Use and Management of Containers

Location of Unit

SEE MAP - #1 ONE 55 gallon drum of
PAINT WASTE - FULL

(HWIMS 160/410)

OK DF NI NA

- 1) Are containers in good condition? ✓ _____
- 2) Are containers compatible with waste in them? ✓ _____
- 3) Are containers managed to prevent leaks? _____ ✓ ^① _____
- 4) Are containers stored closed? _____ ✓ ^① _____
- 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). ✓ _____
- 6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) _____ ✓
- 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? _____ ✓
- 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
- a. Special handling? ✓ _____
- b. No Smoking signs? ✓ _____
- c. Separation and protection from ignition sources? ✓ _____
- 9) Does the container storage area have adequate aisle space (about 2.5 feet)? ✓ _____
- 10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection? ✓ _____

Preparedness and Prevention

- 11) Security - Do security measures include: (HWIMS 300)
- a. 24- hour surveillance? or ✓ _____
- b. Barrier around facility including controlled entry? ✓ _____
- c. Danger sign(s) at entrance? ✓ _____
- 12) Maintenance and Operation of Facility: (HWIMS 140/340, 810 spill)
- a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? ✓ _____

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

OK DF NI NA

- a. Internal communications or alarm systems? ✓ — — —
b. Telephone or 2-way radios at the scene of operations? ✓ — — —
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?
Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) ✓ — — —

14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? ✓ — — —
(HWIMS 140/340)

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment? ✓ — — —
b. Is emergency equipment in operable condition? ✓ — — —
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) ✓ — — —

① 2,55 gallon drum was full and open, with ~~a~~ spillage covering the top of the drum - SEE photograph.

*TSD's Only

check for comments on back!

5017S
kaw
1/13/89

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Generator Accumulation Appendix
(HWIMS 120)

Location of Unit SEE MAP - #1

- | | OK | DF | NI | NA |
|---|----|----|----|----|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3) | — | — | ✓ | — |

ONE (1) 55 gallon drum located west of tank 4001 USED TO ACCUMULATE paint waste generated AND MANAGED by LARK PAINTING.

- | | | | | |
|--|---|----------------|------------------|---|
| 2) Is the container clearly marked with the start of accumulation date?
40 CFR 262.34 (329 IAC 3-9-5) | — | ✓ | — | — |
| 3) Have more than 90 days elapsed since the date inspected in (a)?
40 CFR 262.34 (329 IAC 3-9-5) | — | ✓ | YES ^② | — |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
40 CFR 262.34 (329 IAC 3-9-5) | — | — | — | ✓ |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
40 CFR 262.34 (329 IAC 3-9-5) | — | ✓ ^① | — | — |

① CORRECTED 12/12/90 DURING INSPECTION.

② Bill Maxwell, LARK PAINTING, STATED The drum was 1/2 full when he STARTED WORK AT MARATHON PETROLEUM IN MAY 1990. He WAS NOT AWARE OF ANY SHIPMENTS OF THIS WASTE OFF-SITE.

Satellite Accumulation
(HWIMS 120)

- | | | | | |
|--|---|---|---|---|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
40 CFR 262.34 (329 IAC 3-9-5 (c)) | — | — | — | ✓ |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a)) | — | — | — | ✓ |

Use and Management of Containers

Location of Unit SEE MAP - #2 ONE 55 gallon drum of PAWI
(HWIMS 160/410) WASTE ~ 3/4 full

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) Are containers in good condition? | <u>✓</u> | ___ | ___ | ___ |
| 2) Are containers compatible with waste in them? | <u>✓</u> | ___ | ___ | ___ |
| 3) Are containers managed to prevent leaks? | <u>✓</u> | ___ | ___ | ___ |
| 4) Are containers stored closed? | <u>✓</u> | ___ | ___ | ___ |
| 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). | <u>✓</u> | ___ | ___ | ___ |
| 6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) | ___ | ___ | ___ | <u>✓</u> |
| 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | ___ | ___ | ___ | <u>✓</u> |
| 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? | | | | |
| a. Special handling? | <u>✓</u> | ___ | ___ | ___ |
| b. No Smoking signs? | <u>✓</u> | ___ | ___ | ___ |
| c. Separation and protection from ignition sources? | <u>✓</u> | ___ | ___ | ___ |
| 9) Does the container storage area have adequate aisle space (about 2.5 feet)? | <u>✓</u> | ___ | ___ | ___ |
| 10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection? | <u>✓</u> | ___ | ___ | ___ |

Preparedness and Prevention

- 11) Security - Do security measures include: (HWIMS 300)
- | | | | | |
|--|----------|-----|-----|-----|
| a. 24- hour surveillance? or | ___ | ___ | ___ | ___ |
| b. Barrier around facility including controlled entry? | <u>✓</u> | ___ | ___ | ___ |
| c. Danger sign(s) at entrance? | <u>✓</u> | ___ | ___ | ___ |
- 12) Maintenance and Operation of Facility: (HWIMS 140/340, 810 spill)
- | | | | | |
|--|----------|-----|-----|-----|
| a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | <u>✓</u> | ___ | ___ | ___ |
|--|----------|-----|-----|-----|

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

OK DF NI NA

- a. Internal communications or alarm systems?
b. Telephone or 2-way radios at the scene of operations?
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?
Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify)

✓ — — —
✓ — — —
— — — —
✓ — — —

- 14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?

(HWIMS 140/340)

✓ — — —

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
b. Is emergency equipment in operable condition?

16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?
(This applies to access for this equipment to reach hazardous waste management areas)

✓ — — —
✓ — — —

✓ — — —

*TSD's Only

check for comments on back!

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit SEE MAP # 2

- | | OK | DF | NI | NA |
|--|----------|----------------|----------|----------|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
<u>40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)</u> | — | — | <u>✓</u> | — |
| <u>ONE (1) 55 gallon drum located NEAR "GOAT hill". USED TO ACCUMULATE PAINT WASTE generated AND MANAGED by LARK PAINTING</u> | | | | |
| 2) Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | <u>✓</u> | — | — |
| 3) Have more than 90 days elapsed since the date inspected in (a)?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | <u>UNKNOWN</u> | — | — |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | — | — | — | <u>✓</u> |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | <u>✓</u> | — | — | — |
| <hr/> | | | | |
| <hr/> | | | | |
| <hr/> | | | | |

Satellite Accumulation
(HWIMS 120)

- | | | | | |
|--|---|---|---|----------|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
<u>40 CFR 262.34 (329 IAC 3-9-5 (c))</u> | — | — | — | <u>✓</u> |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
<u>40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))</u> | — | — | — | <u>✓</u> |
| <hr/> | | | | |
| <hr/> | | | | |

Page 25

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit PAINT SHOP - SEE MAP - #3

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations? <u>40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)</u>	—	—	—	<u>✓</u>
<hr/>				
2) Is the container clearly marked with the start of accumulation date? <u>40 CFR 262.34 (329 IAC 3-9-5)</u>	—	—	—	<u>✓</u>
3) Have more than 90 days elapsed since the date inspected in (a)? <u>40 CFR 262.34 (329 IAC 3-9-5)</u>	—	—	—	<u>✓</u>
4) Do wastes remain in accumulation tanks for more than 90 days? <u>40 CFR 262.34 (329 IAC 3-9-5)</u>	—	—	—	<u>✓</u>
5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? <u>40 CFR 262.34 (329 IAC 3-9-5)</u>	—	—	—	<u>✓</u>
<hr/>				
<hr/>				
<hr/>				

Satellite Accumulation
(HWIMS 120)

1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents? <u>40 CFR 262.34 (329 IAC 3-9-5 (c))</u>	<u>✓</u>	—	—	—
2) Are containers in good condition, compatible with the wastes in them and stored closed? <u>40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))</u>	<u>✓</u>	—	—	—
<u>One (1) 55 gallon drum of paint waste ~ 1/3 full</u>				

Use and Management of Containers

Location of Unit SEE MAP - #4 TWO (2) 55 gallon drums of
K052
(HWIMS 160/410)

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) Are containers in good condition? | <u>✓</u> | <u>①</u> | <u> </u> | <u> </u> |
| 2) Are containers compatible with waste in them? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 3) Are containers managed to prevent leaks? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 4) Are containers stored closed? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) | <u> </u> | <u> </u> | <u> </u> | <u>✓</u> |
| 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? | <u> </u> | <u> </u> | <u> </u> | <u>✓</u> |
| 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? | | | | |
| a. Special handling? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| b. No Smoking signs? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| c. Separation and protection from ignition sources? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 9) Does the container storage area have adequate aisle space (about 2.5 feet)? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| 10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |

Preparedness and Prevention

- 11) Security - Do security measures include: (HWIMS 300)
- | | | | | |
|--|-----------|-----------|-----------|-----------|
| a. 24- hour surveillance? or | <u> </u> | <u> </u> | <u> </u> | <u> </u> |
| b. Barrier around facility including controlled entry? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
| c. Danger sign(s) at entrance? | <u>✓</u> | <u> </u> | <u> </u> | <u> </u> |
- 12) Maintenance and Operation of Facility: (HWIMS 140/340, 810 spill)
- | | | | | |
|--|----------|-----------|-----------|-----------|
| a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | <u>✓</u> | <u>NO</u> | <u> </u> | <u> </u> |
|--|----------|-----------|-----------|-----------|

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

OK DF NI NA

- a. Internal communications or alarm systems? ✓ — — —
b. Telephone or 2-way radios at the scene of operations? ✓ — — —
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?
Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) ✓ — — —

14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? ✓ — — —
(HWIMS 140/340)

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment? ✓ — — —
b. Is emergency equipment in operable condition? ✓ — — —

16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) ✓ — — —

① Both containers were on the cement pad next to (west) the TANK accumulating K049, K050, K051. The pad was covered with ~ 1"-3" of water. The bottom of the drums had visible corrosion (rust).

*TSD's Only

check for comments on back!

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit SEE MAP - #4

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|-----------|-----------|-----------|-----------|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
<u>40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)</u> | <u>—</u> | <u>—</u> | <u>✓</u> | <u>—</u> |
| <u>Two (2) 55 gallon drums of K052 located next to the tank</u>
<u>Accumulation.</u> | | | | |

- | | | | | |
|---|----------|----------|----------|----------|
| 2) Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 3) Have more than 90 days elapsed since the date inspected in (a)?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | <u>✓</u> | <u>—</u> | <u>—</u> | <u>—</u> |
| <u> </u> | | | | |
| <u> </u> | | | | |
| <u> </u> | | | | |

Satellite Accumulation
(HWIMS 120)

- | | | | | |
|--|----------|----------|----------|----------|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
<u>40 CFR 262.34 (329 IAC 3-9-5 (c))</u> | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
<u>40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))</u> | <u>—</u> | <u>—</u> | <u>—</u> | <u>✓</u> |
| <u> </u> | | | | |
| <u> </u> | | | | |

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit SEE MAP - #4

- | | OK | DF | NI | NA |
|---|----|----|----|----|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3) | — | — | — | ✓ |

18,000 gallon Tank for KO49, KOSU, and KOSI, SITUATED ON STATIONARY "Low-boy", SEE PHOTOGRAPH.

- | | | | | |
|--|------|---|---|-----|
| 2) Is the container clearly marked with the start of accumulation date?
40 CFR 262.34 (329 IAC 3-9-5) | — | — | — | ✓ ① |
| 3) Have more than 90 days elapsed since the date inspected in (a)?
40 CFR 262.34 (329 IAC 3-9-5) | — | — | — | ✓ |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
40 CFR 262.34 (329 IAC 3-9-5) | ✓ NO | — | — | — |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
40 CFR 262.34 (329 IAC 3-9-5) | ✓ | — | — | — |

① Marathon Petroleum claims this unit to be a container, although provisions had been made to record accumulation dates on a note PAD - none were recorded.

Satellite Accumulation
(HWIMS 120)

- | | | | | |
|--|---|---|---|---|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
40 CFR 262.34 (329 IAC 3-9-5 (c)) | — | — | — | ✓ |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a)) | — | — | — | ✓ |

TANK SYSTEM(S) * SEE COMMENT
PAGE 33

40 CFR 265 - Subpart J - (329 IAC 3-24)

(HWIMS 170/420)

Integrity Assessment Deadlines

<u>Tank System(s)</u>	<u>Deadline</u>
*(1) New installation	At time of
Tank System ID: <u>18,000 gallon</u>	Date: <u>OCT. 15, 1990</u>
(2) Existing Underground- Cannot Enter (interim status and permitted only)	January 12, 1988 (HSA)
Tank System ID: _____	Date: _____
(3) All remaining Existing Tanks	December 20, 1989
Tank System ID: _____	Date: _____

Secondary Containment Deadlines

<u>Tank System(s)</u>	<u>Deadline</u>
*(1) New use	Before putting into
Tank System ID: <u>18,000 gallon</u>	Date: <u>OCT. 15, 1990</u>
(2) Existing Underground that cannot be entered (interim status and permitted only)	January 12, 1988 (HSA)
Tank System ID: _____	Date: _____

* New Tank System = operation or installation commenced after July 14, 1986

(3) Existing that S/T
Dioxin Waste

June 20, 1990

Tank System ID: _____

Date: _____

(4) Existing-Age Known/
Documentable

June 20, 1990/when tank
reaches 15 years old,
whichever is later

Tank System ID: _____

Date: _____

(5) Existing-Age Unknown
Facility Age greater
than 7 years old

June 20, 1990/when
facility reaches 15 years
old, whichever is later

Tank System ID: _____

Date: _____

(6) Existing-Age Unknown
Facility Age less
than 7 years old

June 20, 1996

Tank System ID: _____

Date: _____

Leak Test

All Tank Systems
Without Secondary
Containment

Leak test annually

Tank System ID: 18,000 gallon

Date: _____

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-5)

General Operating Requirements

	<u>YES</u>	<u>NO</u>	<u>NI</u>	<u>NA</u>
1. Are spill prevention controls (e.g. check valves, dry disconnect couplings) in use? <u>329 IAC 3-24-5(b)1</u>	—	—	—	✓
2. Are over fill prevention controls (e.g. level sensing devices, high level alarms) present and operational? <u>329 IAC 3-24-5(b)2</u>	—	✓	—	—
3. Is sufficient freeboard maintained in uncovered tanks to prevent overtopping due to wave or wind action or by precipitation? <u>329 IAC 3-24-5(b)3</u>	—	—	—	✓
4. Has the owner/operator complied with the requirements of 329 IAC 3-24-7 if a leak or spill has occurred in the tank system? (See "leak and spill checklist") <u>329 IAC 3-24-5(c)</u>	—	—	—	✓

* MARATHON PETROLEUM CLAIMS THIS UNIT AS A CONTAINER. THE CAPACITY OF THE UNIT IS 18,000 GALLONS. IT IS LOCATED ON A "LOW-BOY" TRAILER PLACED ON THE CEMENT PAD WEST OF TANK 4001. THE TRAILER FRAME IS STATIONARY AND SUPPORTED BY NUMEROUS LARGE ~~WOODEN~~ WOODEN TIMBERS. THE UNIT HAS NOT BEEN MOVED SINCE INSTALLATION ON OCT. 15, 1990. KO49, KOSO, and KOS1 IS ADDED AND REMOVED FROM THE HATCH IN THE TOP OF THE UNIT. THE UNIT IS OWNED BY NORTH AMERICAN CONSTRUCTION COMPANY (NACC). MR. KIM DEREMIAH and MR. EMMETT WEBB, of NACC, INDICATED THE UNIT HAD BEEN PLACED AT MARATHON PETROLEUM ON OCT. 15, 1990. THE EXACT AGE WAS UNKNOWN BUT ESTIMATED TO BE 40 YEARS. 33

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-6)

General Inspection Requirements

	<u>YES</u>	<u>NO</u>	<u>NI</u>	<u>NA</u>
1. Does the owner/operator inspect, where present overfill spill control equipment, (e.g. waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order, at least once each operating day? <u>329 IAC 3-24-6(a)1</u>	—	—	—	✓
2. Does the owner/operator inspect the above ground portions of the tank system to detect corrosion or release of waste once each operating day? <u>329 IAC 3-24-6(a)2</u>	—	① WEEKLY ✓	—	—
3. Does the owner/operator inspect data gathered from monitoring equipment and leak-detection equipment (e.g. pressure and temperature gauges, monitoring wells) to ensure that tank system is operated according to design once each operating day? <u>329 IAC 3-24-6(a)3</u>	—	—	—	✓
4. Does the owner/operator inspect the construction materials and the area immediately surrounding the accessible portion of the tank system including secondary containment structure to detect erosion or signs of releases once each operating day? <u>329 IAC 3-24-6(a)4</u>	—	✓ WEEKLY	—	—
5. Has the owner/operator confirmed, if present, the proper operation of the cathodic protection system within six (6) months of initial installation? <u>329 IAC 3-24-6(b)1</u>	—	—	—	✓
Date of installation _____ Date of inspection _____				
6. Does the owner/operator inspect the cathodic protector system annually after installation? <u>329 IAC 3-24-6(b)1</u>	—	—	—	✓
7. Does the owner/operator inspect all sources of impressed current at least bi-monthly (every other month)? <u>329 IAC 3-24-6(b)2</u>	—	—	—	✓
Method used to inspect impressed-current system _____				
8. Does the owner/operator document the above-mentioned inspections (#1-7)? <u>329 IAC 3-24-6(c)</u>	—	✓ WEEKLY	—	—

① EXTERIOR OF TANK SEVERLY RUSTED.

TANK SYSTEM(S)

40 CFR 265 - Subpart J - (329 IAC 3-24-3)

New Tank Systems

Tank Volume: 18,000 gallons Tank Type: ABOVE GROUND
above, on, in, below ground

Tank Construction: MILD STEEL
fiberglass, reinforced plastic, mild steel, etc.

YES NO NI NA

1. Has the owner/operator obtained a written assessment reviewed and certified by an independent engineer attesting that the system has sufficient structural integrity and is acceptable for S/T of hazardous waste?
329 IAC 3-24-3(a)
2. Does the assessment include the following:
 - a. Design standards according to which the tank(s) will be constructed
329 IAC 3-24-3(a)1
 - b. Hazardous characteristics of the waste(s) to be handled
329 IAC 3-24-3(a)2
 - c. For tank systems in which the external shell of a metal tank or any component is or will be in contact with the soil or water. Has a corrosion expert conducted a corrosion potential assessment?
329 IAC 3-24-3(a)3A
 - d. Has a corrosion expert determined the type and degree of external corrosion protection that are needed to ensure the integrity of the tank system?
329 IAC 3-24-3(a)3B
 - e. For tank systems that are affected by vehicular traffic has a determination of design and/or operational measures that will protect the tank system against damage.
329 IAC 3-24-3(a)4
 - f. Design considerations to ensure proper tank foundations, anchoring, and prevention of frost heave.
329 IAC 3-24-3(a)5

YES	NO	NI	NA
	✓		

	<u>YES</u>	<u>NO</u>	<u>NI</u>	<u>NA</u>
3. Has a qualified installation inspector or independent engineer inspected the tank installation prior to covering, enclosing, or placing a new tank system in use? <u>329 IAC 3-24-3(b)</u>	—	✓	—	—
4. Did the inspection check for the presence of the following:				
weld breaks	—	—	—	—
punctures	—	—	—	—
scrapes of protective coatings	—	—	—	—
cracks	—	—	—	—
corrosion	—	—	—	—
other structural damage, or inadequate construction	—	—	—	—
5. Has the tank system been tested for tightness prior to being covered, enclosed, or put in use? <u>329 IAC 3-24-3(d)</u>	—	✓	—	—
6. Has the owner/operator provided and has a corrosion expert supervised the installation of any field fabricated corrosion protection (e.g. cathodic protection)? <u>329 IAC 3-24-3(f)</u>	—	—	—	✓
7. Has the owner/operator obtained and kept on file written statements by those persons requested to certify the design and supervise the installation of the tank system in accordance with 329 IAC 3-24-3(b thru f)? <u>329 IAC 3-24-3(g)</u>	—	✓	—	—
8. Do these written statements include the certification statement as required by 329 IAC 3-34-2(d)?	—	✓	—	—

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4)

Secondary Containment

Secondary Containment consist of the following:

(circle one) liner vault, double-walled component, an equivalent device
as approved

Type of leak detection equipment employed. INSPECTION - WEEKLY

	<u>YES</u>	<u>NO</u>	<u>NI</u>	<u>NA</u>
*1. Is the secondary containment system constructed of or lined with materials that are compatible with the waste and have sufficient strength and thickness to prevent failure? <u>329 IAC 3-24-4(c)1</u>	—	—	<u>X</u>	—
*2. Is the secondary containment system placed on a foundation or base capable of providing support? <u>329 IAC 3-24-4(c)2</u>	—	—	<u>X</u>	—
3. Is the secondary containment system provided with a leak detection system that will detect the failure of either the primary or secondary containment structure within 24 hours? <u>329 IAC 3-24-4(c)3</u>	—	—	—	—
			<u>WEEKLY INSPECTION only</u>	
4. Is the secondary containment system sloped or otherwise designed or operated to drain and remove liquids within 24 hours? <u>329 IAC 3-24-(c)4</u>	—	—	—	—
			<u>STANDING WATER OBSERVED DURING BOTH DAYS OF INSPECTION</u>	
*5. Will the secondary containment (liners and vaults) contain 100% of the design capacity of the largest tank in its boundry plus a 25 year - 24 hour rainfall? <u>329 IAC 3-24-4(e)1A and 2A</u>	—	—	<u>X</u>	—
6. Is the secondary containment system designed or operated to prevent run-on or infiltration of precipitation into the system unless the collection system has sufficient excess capacity to contain run-on or infiltration. <u>329 IAC 3-24-4(e)1B and 2B</u>	—	<u>✓</u>	—	—
			<u>ALLOWS RUN ON OF RAIN WATER</u>	
7. <u>External Liner Systems</u>				
a. Does the liner cover all the surrounding earth likely to come into contact with wastes, including berms and dikes? <u>329 IAC 3-24-4(e)1D</u>	<u>✓</u>	—	—	—
b. Whether clay, polymeric, or concrete, is the liner free of cracks, gaps, tears, rips, etc.? <u>329 IAC 3-24-4(e)1C</u>	<u>✓</u>	—	—	—

* Item could not be field verified, requires review by technical staff

	YES	NO	NI	NA
8. Vault Systems				
a. Is the vault constructed with chemically resistant water stops at all joints? <u>329 IAC 3-24-4(e)2C</u>	—	—	—	✓
b. Does all concrete, including sumps, have an impermeable coating or lining? <u>329 IAC 3-24-4(e)2D</u>	—	—	—	—
c. Is there deterioration of protective coatings or liners such as discoloration and film lifting or cracks? <u>329 IAC 3-24-4(e)2D</u>	—	—	—	—
d. Is the vault provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is treated or stored? <u>329 IAC 3-24-4(e)2E</u>	—	—	—	—
9. Double-walled Tanks				
a. If metal, is there appropriate corrosion protection for the inner and outer shell? <u>329 IAC 3-24-4(e)3B</u>	—	—	—	—
b. Does the double-walled tank have an operational, built-in continuous leak-detection system capable of detecting a release within 24 hours or at the earliest practical time? <u>329 IAC 3-24-4(e)3C</u>	—	—	—	—
10. Ancillary Equipment Exempt from Secondary Containment				
a. Is all above ground, straight piping that is not covered by secondary containment inspected daily? <u>329 IAC 3-4(f)1</u>	—	—	—	—
b. Are all welded flanges, welded joints, and welded connections inspected for leaks daily? <u>329 IAC 3-24-4(f)2</u>	—	—	—	—
c. Are all sealless of magnetic coupling pumps visually inspected for leaks daily? <u>329 IAC 3-24-4(f)3</u>	—	—	—	—
d. Are all pressurized, above ground piping systems with automatic shutoff devices visually inspected daily? <u>329 IAC 3-24-4(f)4</u>	—	—	—	—

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-4.7)

Response to Leaks and Spills

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> | <u>NA</u> |
|---|------------|-----------|-----------|-----------|
| 1. In the event of a spill or leak did the owner/operator immediately remove the tank system from service and inspect the system for the cause of the release.
<u>329 IAC 3-24-4-7(a)1</u> | — | — | — | ✓ |
| 2. Was waste removed from leaking tank system and secondary containment within 24 hours of being detected, or at the earliest practicable time?
<u>329 IAC 3-24-7(a)2</u> | — | — | — | ✓ |
| 3. Were visible releases to the environment contained and immediately removed?
<u>329 IAC 3-24-7(a)3</u> | — | — | — | ✓ |
| 4. In the event of a release, to the environment, did the owner/operator report the incident to the Commissioner within 24 hours?
<u>329 IAC 3-24-7(a)4A</u> | — | — | — | ✓ |
| 5. Did the owner/operator submit a written report to the Commissioner within 30 days of a release to the environment with the required information?
<u>329 IAC 3-24-7(a)4C</u> | — | — | — | ✓ |
| 6. In the event of a release, has the tank system or secondary containment system been repaired or closed as required?
<u>329 IAC 3-24-7(a)5</u> | — | — | — | ✓ |
| 7. Were any extensive repairs to the tank system or secondary containment system certified by an independent, qualified, registered engineer.
<u>329 IAC 3-24-7(a)6</u> | — | — | — | ✓ |

No KNOWN RELEASES

TANK SYSTEMS

40 CFR 265 - Subpart J - (329 IAC 3-24-9 and 10)

Ignitable or Reactive Waste

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> | <u>NA</u> |
|---|------------|-----------|-----------|-----------|
| 1. Has the waste been treated, mixed or otherwise rendered nonreactive or not ignitable?
<u>329 IAC 3-24-9(a)1</u> | ___ | ___ | ___ | <u>✓</u> |
| -or- | | | | |
| 2. Is the tank protected from conditions that may cause it to ignite (use of spark proof tools) or protected from contact with materials that may cause it to react?
<u>329 IAC 3-24-9(a)2</u> | <u>✓</u> | ___ | ___ | ___ |
| 3. Is the required National Fire Protection Association distance between waste tanks (ignitable waste) and public ways and adjoining properties maintained?
<u>329 IAC 3-24-9(b)</u> | <u>✓</u> | ___ | ___ | ___ |
| 4. Has an appropriate method of tank system decontamination been selected for tanks which previously held incompatible waste?
<u>329 IAC 3-24-10(a and b)</u> | ___ | ___ | ___ | <u>✓</u> |

TANK SYSTEMS

Preparedness and Prevention

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> | <u>NA</u> |
|--|------------|-----------|-----------|-----------|
| 1. Security - Do security measures include: (HWIMS 300) | | | | |
| a. 24-hour surveillance? or | <u>✓</u> | — | — | — |
| b. Barrier around facility including controlled entry? | <u>✓</u> | — | — | — |
| c. Danger sign(s) at entrance? | — | — | — | — |
| 2. Maintenance and Operation of Facility (HWIMS 140/340, 810 spill) | | | | |
| a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | — | <u>✓</u> | — | — |
| 3. If required, does the facility have the following equipment? (HWIMS 140/340) | | | | |
| a. Internal communications or alarm systems? | <u>✓</u> | — | — | — |
| b. Telephone or <u>2-way radios</u> at the scene of operations? | <u>✓</u> | — | — | — |
| c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify.) | <u>✓</u> | — | — | — |
| 4. Whenever waste is being handled, do all personnel have immediate access to an alarm or communication device (through another employee if always available)? (HWIMS 140/340) | <u>✓</u> | — | — | — |

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

- | | | | | |
|--|----------|---|---|---|
| 5. a. Has the owner or operator established testing and maintenance procedures for emergency equipment? | <u>✓</u> | — | — | — |
| b. Is emergency equipment in operable condition? | <u>✓</u> | — | — | — |
| 6. Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas.) | <u>✓</u> | — | — | — |

5041S
kaw
4/6/89

Appendix C
Hazardous Waste Burned for Energy Recovery
Section I. is for marketers and Section II. for burners
(HWIMS 500)

I. Marketers

	<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1) Has this facility notified as a Marketer? (266.34(b)) and (329 IAC 3-32.5-9(b))	<u>✓</u>	—	—	—
2) Is the hazardous waste fuel stored as a hazardous waste? (266.34(c)) and (329 IAC 3-32.5-9(c))	<u>✓</u>	—	—	—
3) Is the hazardous waste fuel shipped offsite with a manifest? (266.34(d)) and (329 IAC 3-32.5-9(d))	<u>✓</u>	—	—	—
4) Has the marketer obtained a one-time certification from the burner or other marketer that;				
a. The burner or marketer has notified of their waste as fuel activities? (266.34(e)(1)i) and (329 IAC 3-32.5-9(e)(1)i)	<u>✓</u>	—	—	—
b. If the recipient is a burner that the waste will be burned only in approved industrial furnaces or boilers (See 266.31(a)(2)b)? (266.34(e)(1)ii) and (329 IAC 3-32.5-9(e)(1)ii)	<u>✓</u>	—	—	—
5) Has the marketer provided a one-time certification that he has notified of his waste as fuel activity prior to his first shipment of fuel to that another marketer? (266.34(e)(2)) and (329 IAC 3-32.5-9(e)(2))	—	—	—	<u>✓</u>
6) Are all certifications received or sent by the marketer maintained at the site for at least three (3) years? (266.34(f)) and (329 IAC 3-32.5-9(f))	<u>✓</u>	—	—	—

Comments:

Generator markets directly to burner.

II. Burners

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|---|-----------|-----------|-----------|-----------|
| 1) Has this facility notified as a Burner?
(266.35(b)) and (329 IAC 3-32.5-10(b)) | — | — | — | <u>✓</u> |
| 2) Is the hazardous waste fuel stored (or accumulated
for generators who burn on site) as a hazardous
waste?
(266.35(c)1 & 2) and (329 IAC 3-32.5-10(c)1 & 2) | — | — | — | <u>✓</u> |
| 3) Has the burner provided the marketer with a certification
that he has notified of waste as fuel activites and
that he will burn only in approved furnaces or
boilers?
(266.35(d)) and (329 IAC 3-32.5-10(d)) | — | — | — | <u>✓</u> |
| 4) Are certification forms provided to marketers maintained
on file for at least three (3) years?
(266.35(e)) and (329 IAC 3-32.5-10(e)) | — | — | — | <u>✓</u> |

Comments:

WASTE PILE NO LONGER IN USE - WASTE
AND CONTAMINATED SOIL HAVE BEEN REMOVED.
WASTE PILES

40 CFR 265, Subpart L

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> | <u>NA</u> |
|---|------------|-----------|-----------|-----------|
| 1) Is wind dispersal of hazardous waste managed?
<u>40 CFR 265.251 (329 IAC 3-26-2)</u> | — | — | — | <u>✓</u> |
| 2) Is the pile protected from precipitation and run-on
by some means (such as being under roof)?
<u>40 CFR 265.253(b) (329 IAC 3-26-4-(b)1)</u>
(IF NOT then go to number 3) | — | — | — | <u>✓</u> |
| 3) Are liquids or wastes containing liquids placed in the
pile?
<u>40 CFR 265.253(b) (329 IAC 3-26-4-(b)2)</u>
(IF SO then go to number 3) | — | <u>✓</u> | — | — |
| | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
| 4) Does the facility maintain a proper
run-on control system?
<u>40 CFR 265.253(a)2 (329 IAC 3-26-4(a)2)</u> | — | — | — | <u>✓</u> |
| 5) Does the facility maintain a proper run-off system?
<u>40 CFR 265.253(a)3 (329 IAC 3-26-4(a)3)</u> | — | — | — | <u>✓</u> |
| 6) Are run-off and run-on collection and holding facilities
managed or emptied expeditiously after storms?
<u>40 CFR 265.253(a)4 (329 IAC 3-26-4(a)4)</u> | — | — | — | <u>✓</u> |
| 7) If required, are reactive or flammable wastes handled
properly?
<u>40 CFR 265.256 & 257 (329 IAC 3-26-5 & 6)</u> | — | — | — | <u>✓</u> |

Please describe the location of the pile including data pertinent to regulatory status (ie. inside, outside)

GOAT HILL AREA - SEE MAP. MARATHON PETROLEUM HAS COMPLETED
REMOVAL OF CONTAMINATED SOIL AND IS AWAITING APPROVAL OF GROUND-
WATER STUDY

Please describe run-on and run-off control activities.

OK NO NI NA

- 1) Security - Do security measures include:
(If applicable)

See 40 CFR 265.14 (329 IAC 3-16-5) for the following

- | | | | | | |
|----|---|---|---|---|---|
| a. | 24-hour surveillance? | — | — | — | ✓ |
| | or | | | | |
| b. | i. Artificial or natural barrier around facility? | ✓ | — | — | — |
| | and | | | | |
| | ii. Controlled entry? | ✓ | — | — | — |
| c. | Danger sign(s) at entrance? | ✓ | — | — | — |

Preparedness and Prevention:

Part 265 Subpart C

- 2) Maintenance and Operation of Facility

- | | | | | | |
|----|---|---|---|---|---|
| a. | Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? | — | ✓ | — | — |
| | <u>40 CFR 265.31 (329 IAC 3-17-2)</u> | | | | |

- 3) If required, does the facility have the following equipment:

- | | | | | | |
|----|--|---|---|---|---|
| a. | Internal communications or alarm systems? | ✓ | — | — | — |
| | <u>40 CFR 265.32(a) & 40 CFR 265.34(a) (329 IAC 3-17-3 & 5)</u> | | | | |
| b. | Telephone or <u>2-way radios</u> at the scene of operations? | ✓ | — | — | — |
| | <u>40 CFR 265.32(b) & 40 CFR 265.34(b) (329 IAC 3-17-3 & 5)</u> | | | | |
| c. | Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | | | | |
| | Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) | ✓ | — | — | — |
| | <u>40 CFR 265.32(c) (329 IAC 3-17-3(c))</u> | | | | |

OK DF NI NA

- 4) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?
40 CFR 265.34(a) (329 IAC 3-17-5)

✓ _ _ _

5) Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
40 CFR 265.33 (329 IAC 3-17-4)

✓ _ _ _

- b. Is emergency equipment maintained in operable condition?
40 CFR 265.33 (329 IAC 3-17-4)

✓ _ _ _

- 6) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)
40 CFR 265.35 (329 IAC 3-17-6)

✓ _ _ _

Appendix S
Spill Identification Checklist

1) What are the suspected wastes or products that have been spilled?

KO49, KO50, KO51

2) Estimate the quantity of materials spilled if that information is available.

~ 1 - 2 55 gallon drums.

3) Using landmarks describe the location of the spill.

Building USED TO collect Filter cake in Oliver dumpster.

SEE PHOTO

4) Draw a map of the spill area using one square to equal one foot unless more area is required. Include landmarks somewhere in the map with distances to two sides of the spill indicated. Use the map grid on the next page for the map.

5) Was a copy of the sampling and analysis plan handout left with representatives of the facility? YES ☐ NO ☒

Other Comments

The generation of filter cake has been discontinued
however visible waste remains where the dumpster
was previously located

Inspector signature Bruce Hagen

Facility Representative signature
(acknowledging receipt of spill handout)
11/30/87

page 47

SEE PHOTOGRAPH

6/90

MARATHON PETROLEUM COMPANY
Indiana Refining Division

Job classifications related to Hazardous Waste Management:

JOB CLASSIFICATION	CURRENT EMPLOYEE
Environmental Manager	W. Laque
Environmental Engineer	P. Sorensen
Fire Protection/Safety Supervisor	V. Meeks, D. Lessel (Back-up)
Area 4 Maintenance Foreman	R. Jones
Area 1 Operations Foreman	B. Tyler
Area 1, No. 2 Operator	A. Engel
	S. Gariepy
	S. Pierce
	C. Miller
	T. Schooler
	T. Battle
Area 1, No. 3 Operator	J. Cotton
	T. Hughes
	W. Benjamin
	M. Wilson
Area 1, No. 4 Operator	C. Brown, S. Miller (Back-up)
	C. Burtner
	J. Finley
	E. Bartle
Area 1 Lead Operator	W. Steen, H. Livingston (Back-up)
Vacuum Truck Driver	S. Richardson
Warehouse Supervisor	J. Phillips, J. Clark (Back-up)
Labor Truck Driver	J. Wells
Craftsmen Foreman	R. White

JUN 11 1990

The following persons (in the order in which they will assume responsibility as alternates) are qualified to act as the Emergency Control Coordinator in the case of any unplanned sudden or nonsudden release of hazardous waste, or oil spill.

<u>Name</u>	<u>Address</u>	<u>Home Phone</u>	<u>Office Phone</u>
1. Dave Harris			(872-3200) (Ext.) 645
2. Scott Maddox			500
3. Allen Moyes			111
4. Von Meeks			426
5. Don Lessel			421
6. Jerry Ranney			300
7. John Swearingen			120
8. Russ Bunton			625
9. Curt Sebastian			525
10. Bill Laque			122
11. Pat Sorensen			123

The emergency numbers for the local police authorities, fire authorities, hospitals and state and local response teams are set forth in pages 2-4 of this Plan.

The designated Emergency Control Coordinator, pursuant to 40 C.F.R. Sec. 265.56, should immediately take the following action where there is an imminent or actual emergency situation:

1. Notify facility personnel of the emergency situation by using available communication systems.
2. Notify appropriate State or local authorities if help is needed.

Whenever there is a release, fire, or explosion, the Emergency Control Coordinator should immediately:

MR William Logue - Env. Manager
Ms. Pat Sorensen " Eng.

PREINSPECTION FILES AUDIT
CHECKLIST

DATE: 12/10/90

BY: Bruce Higin

COMPANY: MARATHON PETROLEUM Co.

LOCATION: 5000 W. 86TH ST., Indpls., IN 46268

I.D.#: IND/000/641/730

Type of inspection: G---T---TSD---Closure---Complaint---Other(please specify)

A. GENERAL

	YES	NO	NA
1. FEDERAL NOTIFICATION ON FILE?	<u>✓</u>	—	—
2. FEDERAL PART A ON FILE?	<u>✓</u>	—	—
3. CLOSURE PLAN REVIEWED?	—	—	—
4. CONTINGENCY PLAN REVIEWED?	<u>✓ 1988 G/TSD 9/7/89 version</u>	—	—
5. BIENNIAL REPORT REVIEWED?	<u>✓ 1985 only</u>	—	—
*6. PART B PERMIT REVIEWED?	—	—	<u>✓</u>

*(Note any Special Permit Conditions)
Comments:

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

7/10/80 - G/TSD

10/4/89 - G only

U.S. EPA letter of 8/1/90 added HW Fuel Marketing,
Generator marketing to burner, added codes K04R and
D001, D002, D000 (VOC)

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

K049, K050, K051

WASTE PILE - CEASED OPERATION

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT 9/16/86

	<u>Code</u>	<u>Amount</u>	<u>Unit of Measure</u>
1.	<u>T01</u>	<u>3,456,000</u>	<u>Gallons</u>
2.	<u>S02</u>	<u>6000</u>	<u>Gallons</u>
3.	<u>T04</u>	<u>23,040</u>	<u>Gallons/Day</u>
4.	<u>D81</u>	<u>40</u>	<u>Acres</u>
5.	<u>T03</u>	<u>0.02</u>	<u>TONS/HOUR</u>

Are there any discrepancies regarding multiple Part A submittals? yes

G. CLOSURE/POST CLOSURE

1. Any Closed Units: If yes, describe:

S03 - goat hill - not officially closed - under Tech. review.

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

<u>Date of inspection</u>	<u>Action type</u>	<u>Date of Action</u>
<u>12/28 & 12/29/87</u>	<u>SCE</u>	<u>RES</u> on-going in Federal CAFO
<u>12/16 & 12/17/88</u>	<u>SCE</u>	<u>RES</u> V-W-88-R-038

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

WASTE Pile at Tank 4001 and several spill areas observed in 1988 & 1989 inspections have not been addressed by enf and was not included in CAFO

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

See Trip reports for ~~9/2/90~~ ~~9/3/90~~ 3/8/90, & 2/3/89
& ^{mes} Enf memo 9/12/90

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR NEED FIELD VERIFIED

Federal CAFO V-W-88-R-038 see attached

L. COMMENTS

6/1/90 IDEM Agrees pre-filtered slop oil and mixture of filter cake and oil are hazardous waste fuel. Both from WWT facility.

Waste generated 1/1/90 - 11/30/90 per manifest tracking
D001, KOMK, D002 Acidizing waste
1500#/mon 60X/mon 14,000G

cooling tower sludge D002?

Waste recycle or D001?

Special Waste - Oil Contaminated fly ash, jet fuel
treated clay, Tank bottoms - No current disposal approvals

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: MARATHON PETROLEUM CO.
U.S. EPA ID No.: IND 000 641 730 *wrong ID. correct ID: IND 000 641 730*
Street: P.O. BOX 68007, 5000 WEST 86TH ST.
City: Indianapolis State: IN Zip: 46268
Telephone: 317/872-3200

Inspection Date: 12/11-12/90 Time: 9-4 (am/pm)
Weather Conditions: Sunny, 60°F

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone</u>
Inspectors:	<u>BRUCE KIRER</u>	<u>IDEM</u>	<u>317/232-4537</u>

Facility Representatives:	<u>MS. PAT SORENSEN</u>	<u>ENV. MANAGER</u>	<u>317/872-3200</u>
	<u>MR. ED SPOELKER</u>	<u>ENV. ENGINEER</u>	<u>" " "</u>

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
F020-F023 and F026-F028	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
California List *	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
First Third [40 CFR 268.10]	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Second Third [40 CFR 268.11]	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Third Third [40 CFR 268.12]	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

* See Appendix A

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Waste Management Division
U.S. EPA, REGION V

INSPECTION SUMMARY

Processes That Generate LDR Wastes: MARATHON PETROLEUM CO. (MPC) IS A CRUDE OIL REFINERY. WASTES ARE GENERATED FROM 2 API SEPARATORS AND STORAGE OF LEAKED GASOLINE. ~~STORAGE~~ PARTS WASHERS generate D001 WASTE, PAINTING generates F003, F005, D001 WASTES.

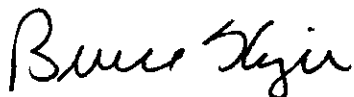
LDR Waste Management:

WASTES ARE ACCUMULATED IN 55 gallon DRUMS AND (1) 18,000 gallon TANK. SHIPPED OFF-SITE TO TWO CEMENT KILNS AS A HAZ. WASTE FUEL. K-listed WASTES K049, K050, K051 are all combined at the API

Summary:

TSD ACTIVITIES HAVE CEASED AND CLOSURE IS PROCEEDING. FACILITY TO COMPLY WITH GENERATOR STANDARD PER FEDERAL CAFO V-W-88-R-038. THEREFORE THE TSD CHECKLIST WAS NOT COMPLETED

Signature:



RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents: F003, F005
2. F020-F023 and F026-F028 dioxin-containing wastes: _____
3. California List Wastes (See Appendix A): D001
4. First Third Wastes [40 CFR 268.10]: _____
5. Second Third Wastes [40 CFR 268.11]: _____
6. Third Third Wastes [40 CFR 268.12]**: K048, K049, K050, K051, K052

*See Appendix B.

** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

Yes ☒ No ☐

If no, list below:

Assigned Classification

Correct Classification

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☒ No ☐ List K048, K049, K050, K051, K052

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ☐ No ☒ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ☐ No ☒ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
<u>F003</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>F005</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ☐ No ☐ NA ☒

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>
<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ☐ NA ☐

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
<u>K048</u>	<u>NA</u>		<input checked="" type="checkbox"/>
<u>K049</u>			<input checked="" type="checkbox"/>
<u>K050</u>			<input checked="" type="checkbox"/>
<u>K051</u>			<input checked="" type="checkbox"/>

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ___ No ___ NA ☒

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ___ NA ☒

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents

___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ☒

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm

Yes ___ No ___ NA ☒

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs

___ ≥ 500 ppm PCBs

- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group:

☐ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
☒ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ☐ No ☐ NA ☒

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ☐ No ☐ NA ☒

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ☐ No ☐ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Comments

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☐ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☐ No ☐

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☒ No ☐

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☒ No ☐

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

D001, F003, F005, K048, K049, K051, K050

- b. - TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?*** (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ☐ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method 1311)

**See Appendix C for exceptions.

***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

[40 CFR 268.7(a)(5)]

TCLP WAS RUN ON K-LISTED WASTES 9/25/90 SEE ATTACHMENT A

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ☒ NA ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ☒ NA ___

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☒ No ☐ (If No, go to b.)

List the wastes K049, K050, K057

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☒ No ☐

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ___ No ☒

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ☒

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
K048	SYSTECH CORP
K049	
K050	COPLAY CEMENT
K051	
K052	

Revised 09/90

D001, ~~F002~~, SAFETY-KLEEN
F003, F005 " "

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

EXAMPLE NOTIFICATION
SEE ATTACHMENT 1

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

Is a notification sent with each waste shipment?

Yes ☐ No ☒

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☒ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

MPC failed to send notification to goody's -
held for 1001 shipments
for the following manifest

b.

INA 0492759 10/19/90
INA 0480239 10/11/90
INA 0473010 9/17/90
INA 0457485 9/17/90
INA 0503978 11/14/90

MPC failed to send a proper notification after Nov. 8, 1990 for the following manifests (SEE ATTACHMENT C):

a.

INA 0436875 11/12/90
INA 0436815 11/8/90
INA 0436869 11/27/90
INA 0436870 11/29/90

All notifications after the 11/29/90 manifest were as shown in attachment B.

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste CodeSubsequent Handler

_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste CodeReceiving Facility

_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ☒ (If No, go to 5.)NOT SINCE
11/18/90

Complete the following table:

Waste CodeReceiving Facility

_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ☐ No ☐

b. Is a notification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ☐

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☐ No ☐ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☒ No ☐ NA ☐ *shipment AS HAZ. WASTE FUEL TO CEMENT KILN*

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes _____ No ☒ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
------------	-------------------	-------------------------------

2. Are treatment residuals generated from these units?

Yes _____ No _____

Comments

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes No NA

(If yes, the TSD checklist must also be completed.)

E. Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

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NATIONAL
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ANALYTICAL REPORT

Mr. Bill Laque
MARATHON PETROLEUM COMP.
5000 W. 86th Street
Indianapolis, IN 46268

09-25-90

Sample No.: 26412

P.O. NO.: RIL2626

Page 9

Sample Description: RAW SLOP MIX

Date Taken: 07-19-90

Date Received: 07-19-90

<u>Parameters</u>	<u>Results</u>	<u>Units</u>
TCLP - Arsenic	<0.2	mg/L
TCLP - Barium	<0.3	mg/L
TCLP - Cadmium	<0.02	mg/L
TCLP - Chromium	0.20	mg/L
TCLP - Lead	<0.1	mg/L
TCLP - Mercury	<0.002	mg/L
TCLP - Selenium	<0.1	mg/L
TCLP - Silver	<0.05	mg/L
 TCLP - VOLATILES		
Benzene	1880.	ug/L
Carbon tetrachloride	<100.	ug/L
Chlorobenzene	<100.	ug/L
Chloroform	<100.	ug/L
1,2-Dichloroethane	<100.	ug/L
1,1-Dichloroethene	<100.	ug/L
Tetrachloroethene	<100.	ug/L
Trichloroethene	<100.	ug/L
Vinyl chloride	<1000.	ug/L
Methyl ethyl ketone	<1000.	ug/L
 TCLP - SVOA		
1,4-Dichlorobenzene	<40.	ug/L
2,4-Dinitrotoluene	<40.	ug/L
Hexachlorobenzene	<40.	ug/L
Hexachlorobutadiene	<40.	ug/L
Hexachloroethane	<40.	ug/L
Nitrobenzene	<40.	ug/L
Pyridine	<40.	ug/L


Joseph D. Shafer
Division Manager



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ANALYTICAL REPORT

Mr. Bill Laque
MARATHON PETROLEUM COMP.
5000 W. 86th Street
Indianapolis, IN 46268

09-25-90

Sample No.: 26412

P.O. NO.: RIL2626

Page 10

Sample Description: RAW SLOP MIX

Date Taken: 07-19-90

Date Received: 07-19-90

<u>Parameters</u>	<u>Results</u>	<u>Units</u>
TCLP - SVOA		
2,4,6-trichlorophenol	<40.	ug/L
Pentachlorophenol	<200.	ug/L
2,4,5-trichlorophenol	<40.	ug/L
Cresol	532.	ug/L

Joseph D. Shafer
Division Manager



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FIELD SAMPLING DATA

Sample No: 26412

Sample Identification: RAW SLOP MIX

Grab Sample: Time, Date 9:50 AM 07-19-90

WEATHER CONDITIONS

- General Conditions Sunny
- Temperature 70 - 75 Degrees F
- Wind speed/direction Mild - SW

COMPOSITE SAMPLE

- Time, date first sample taken N/A
- Time, date sampling sequence over N/A
- Time, interval between samples N/A

Proportional to actual flow conditions

Water temperature, degrees C (on site)

pH (on site)

Specific conductivity (on site)

FLOW DATA

- From calculation based on instantaneous flow measurement N/A
- Based on actual measurement during monitoring period N/A

Sampling Performed By: NET Midwest (BM)

GENERAL NOTES & OBSERVATIONS:

GENERAL METHODOLOGY REFERENCES

1. Handbook for Sampling & Preservation of Water & Wastewater, EPA-600/4-76-049, 1976.
2. Water Measurement Manual; U.S. Dept. of Int., BLM, 1974
3. Standard Methods for Examination of Water & Wastewater, 16th Edition, 1985
4. Handbook for Monitoring Industrial Wastewater, E.P.A. Technology Transfer, 1973



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TCLP SUPPORT DATA

Sample Description: RAW SLOP MIX Sample No.: 26412

1. Percent solids of the waste after drying at 103 C ---
2. Weight of sample retained for extraction 100 gr.
3. Volume of filterable liquid that the waste sample contained (c) 0
4. Solid portion of sample:
 - a. Sifted through 9.5 mm standard sieve Yes
 - b. Surface area per gram of material equal to or greater than 3.1 square centimeters No
 - c. Cut, crushed or ground to the point where it passes through a 9.5 mm standard sieve No
 - d. Subjected to the "Structural Integrity Procedure" No
5. Weight (w) of the solid portion 100 gr.
6. Total volume (v) of solution # 1 (v=20w) placed in the extractor 2,000 mls.
7. Solution # 1 pH 4.93 Date Prepared 7-25-90

TIME
ELAPSED

pH

Initial

0 Hours

18 Hours

9.04

4.95

5.20

Started 3:00pm 7-25-90

Ended 9:00AM 7-26-90



NATIONAL
ENVIRONMENTAL
TESTING, INC.

NET Midwest, Inc.
Indianapolis Division
6964 Hillsdale Court
Indianapolis, IN 46250
Tel: (317) 842-4261
Fax: (317) 842-4286

TCLP ZHE SUPPORT DATA

Sample Description: RAW SLOP MIX Sample No.: 26412

1. Percent solids of the waste after drying at 103 C ...

2. Weight of sample retained for extraction 25 gr.

3. Volume of filterable liquid that the waste sample contained (c) 0

4. Solid portion of sample:

a. Sifted through 9.5 mm standard sieve Yes

b. Surface area per gram of material equal to or greater than 3.1 square centimeters No

c. Cut, crushed or ground to the point where it passes through a 9.5 mm standard sieve No

d. Subjected to the "Structural Integrity Procedure" No

5. Weight (w) of the solid portion 25 gr.

6. Total volume (v) of solution # 1 ($v=20w$) placed in the extractor 500 mls.

7. Solution # 1 pH 4.93 Date Prepared 7-24-90

Started 2:00pm 7-24-90

Ended 8:00Am 7-25-90

NOTIFICATION OF HAZARDOUS WASTE RESTRICTED FROM LAND DISPOSAL

Systech Environmental Corporation

245 North Valley Road

Xenia, Ohio 45385

A form must be completed by the generator and should accompany each shipment of waste subject to land ban restrictions (40 CFR 268.32). Use a separate form for each line (11a, 11b, 11c, 11d) on your manifest. Check the appropriate category(ies) on the table(s) from Sections I, II, and III below and be sure to sign at the bottom.

Generator Name: Marathon Petroleum Co., Ind. Ref. Div. EPA I.D. #: IND 006417430

Manifest Doc No.: _____ Systech Waste Profile No.: AA03534-448

Date of Shipment: _____ EPA Waste Code K048, K049, K050, K051, D018

MANIFEST LINE #: (X)11a ()11b ()11c ()11d

I. The wastes identified on the above-mentioned manifest number and bearing the EPA Hazardous Waste Number(s) identified above are subject to the land disposal restrictions of 40 CFR Part 268. The wastes do not meet the treatment standards specified in 40 CFR 268 subpart D or the prohibitions specified in 40 CFR 268.32 or RCRA Section 3004 (d). In compliance with the notification requirements of 40 CFR 268, we are indicating below the applicable subcategory, Treatability Group and Treatment Standard Reference or Five Section Code for how the waste must be treated.

F001 to F005 Solvent Wastes

Hazardous Waste Description	Constituents of Concern	Non-Wastewater Total Composition, mg/kg CCW1	TCLP, mg/L CCWE2		Wastewater, Total Composition, mg/L CCW1	TCLP, mg/L CCWE2	
F001 - Spent halogenated solvents used in degreasing	Carbon tetrachloride Methylene chloride Tetrachloroethylene 1,1,1-trichloroethane Trichloroethylene 1,1,2-Trichloro-1,2,2-trifluoroethane Trichlorofluoromethane		0.96 0.96 0.05 0.41 0.001 0.96 0.96	_____ _____ _____ _____ _____ _____ _____		0.05 0.20 0.079 1.05 0.062 1.05 0.05	_____ _____ _____ _____ _____ _____ _____
F002-Spent halogenated solvents	Chlorobenzene 1,2-Dichlorobenzene Methylene chloride Methylene chloride (from the pharmaceutical industry) Tetrachloroethylene 1,1,1-Trichloroethane 1,1,2-Trichloroethane Trichloroethylene 1,1,2-Trichloro-1,2,2-trifluoroethane Trichlorofluoromethane	7.6	0.05 0.125 0.96 0.05 0.41 .001 0.96 0.96	_____ _____ _____ _____ _____ _____ _____ _____ _____	.44 0.030	0.15 .65 0.20 0.079 1.05 0.062 1.05 0.05	_____ _____ _____ _____ _____ _____ _____ _____ _____
F003-Spent nonhalogenated solvents	Acetone n-Butyl alcohol Cyclohexanone Ethyl acetate Ethyl benzene Ethyl ether Methanol Methyl isobutyl ketone Xylene		0.50 5.0 0.75 0.75 0.053 0.75 0.75 0.33 0.15	_____ _____ _____ _____ _____ _____ _____ _____ _____		0.05 5.0 0.125 0.05 0.05 0.05 0.25 0.05 0.05	_____ _____ _____ _____ _____ _____ _____ _____ _____
F004-Spent nonhalogenated solvents	Cresols (and cresylic acid) Nitrobenzene		0.750 0.125	_____ _____		2.82 0.66	_____ _____
F005-Spent nonhalogenated solvents	Benzene Carbon disulfide 2-Ethoxyethanol Isobutanol Methyl ethyl ketone 2-Nitropropane Pyridine Toluene	3.7 Incineration Incineration	4.81 5.0 0.75 0.33 0.33	_____ _____ _____ _____ _____ _____ _____ _____	0.070 Biological degradation or incineration (Wet oxidation or chemical oxidation) followed by carbon adsorption or incineration	1.05 5.0 0.05 1.12 1.12	_____ _____ _____ _____ _____ _____ _____ _____

II. California List Wastes

- () PCBs >50 ppm (incineration).
- () Liquid hazardous wastes that contain halogenated organic compounds (HOC's) in total concentration > or = to 1,000 mg/l liquids or 1,000 mg/kg (nonliquids). (INCINERATION) (HOC's found in 268.32 Appendix III, see attached).
- () Nickel (liquid waste) >134 ppm.
- () Thallium (liquid waste) >130 ppm.

III. Additional Hazardous Characteristics

- () No additional Hazardous Characteristics are exhibited by this waste which would require treatment beyond the standards described above.
 (X) Treatment Standards for the additional Hazardous Characteristics requiring treatment are indicated below.

Table A: TREATMENT STANDARDS FOR ADDITIONAL HAZARDOUS WASTE CHARACTERISTIC TREATMENT STANDARDS (40 CFR 268)
 Check any applicable subcategories.

Hazardous Waste Subcategories	Constituents of Concern	NONWASTEWATER		WASTEWATER	
		Total Composition mg/kg	TCLP mg/L	Total Composition mg/L	
D001 - Ignitable liquids High - TOC nonwastewater (>10% TOC)		INCIN, FSUBS, BORGs		N.A.	
D001 - Ignitable liquids (Low TOC nonwastewater 1% TOC <10%)		DEACT		N.A.	
D001 - Ignitable liquids wastewater (<1% TOC <1% ISS)		N.A.		DEACT	
D001 - Ignitable compressed gases		DEACT		N.A.	
D001 - Ignitable reactives		DEACT		N.A.	
D001 - Oxidizers		DEACT		DEACT	
D002 - Acidic corrosives		DEACT		DEACT	
D002 - Alkaline corrosives		DEACT		DEACT	
D002 - Other corrosives		DEACT		DEACT	
D004 - Arsenic	Arsenic		5	5	
D005 - Barium	Barium		100	100	
D006 - Cadmium	Cadmium		1	1	
D007 - Chromium	Chromium (total)		5	5	
D008 - Lead	Lead		5	5	
D009 - Low mercury (< 260mg/kg total Hg)	Mercury		0.2	0.2	
D009 - High mercury (> or = 260 mg/kg total Hg)	Mercury w/organics Mercury w/inorganics	IMERC, RMERC RMERC			
D010 - Selenium	Selenium		5.7	1	
D011 - Silver	Silver		5	5	
D012 - Endrin	Endrin	0.13		INCIN, BIOOG	
D013 - Lindene	Lindene	0.066		INCIN, CARBN	
D014 - Methoxychlor	Methoxychlor	0.18		INCIN, WETOX	
D015 - Toxaphene	Toxaphene	1.3		INCIN, BIOOG	
D016 - 2,4-D	2,4-D	10		INCIN, CHOXD, BIOOG	
D017 - 2,4,5-Silver	2,4,5-TP	7.9		INCIN, CHOXD	

Abbreviations of technology codes from 40 CFR 268.42:

INCIN (Incineration) DEACT (Deactivation to remove the characteristic)
 FSUBS (Fuel substitution) RTHERM (Thermal recovery)
 BORGs (Recovery of organics) RLEAD (Thermal recovery of lead in secondary smelters)
 IMERC (Roasting/retorting of organics) AMALG (Amalgamation)
 RMERC (Incineration followed by roasting/retorting of ash) BIOOG (Biodegradation)
 CARBN (Carbon adsorption)
 WETOX (Wet air oxidation) CHOXD (Chemical Oxidation)

Table B: 1. List all U.S. EPA hazardous waste codes requiring treatment beyond the standards described in Sections I, II, and Table A. For each waste code: 2. Identify the appropriate line # from the manifest Section 11; 3. List the corresponding subcategory, check none if there is no subcategory; 4. Complete the treatment standards section by placing a checkmark in the appropriate performance-based column or write the appropriate code in the specific technology column (listed above); and 5. Place a checkmark in the column that applies to this waste.

1. U.S. EPA Hazardous Waste Code (s)	2. Manifest Line # Section 11	3. Subcategory Description		4. Applicable Treatment Performance Based		5. Waste Manage Method (enter number from below)
				268.41(a)	268.43	
			None	CCME ²	CCW ¹	Waste-water Nonwaste-water
K048	a		X	X	X	X
K049	a		X	X	X	X
K050	a		X	X	X	X
K051	a		X	X	X	X

¹CCW - Constituent concentrations in wastes. ²CCME - Constituent concentrations in waste extract.

Certification

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Company Name Marathon Petroleum Co., Indiana Refining Division

Authorized Signature _____ Date _____

Revised 11/09/90



PLEASE PRINT OR TYPE

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.
I. N. D. 0. 0. 6. 4. 1. 7. 4. 3. 0

Manifest Document No.
0 2 4 4 5

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but items D, F, H and I are required by State law.

3. Generator's Name and Mailing Address

Marathon Petroleum Co., Indiana Refining Division
5000 W. 86th Street, Indianapolis, IN 46268
317, 872-3200

A. State Manifest Document Number

INA 0436870

B. State Generator's ID

4. Generator's Phone

5. Transporter 1 Company Name

North American Construction

6. Use EPA ID Number

I. N. D. 9. 8. 1. 0. 9. 1. 8. 1. 2

C. State Transporter's ID

317/875-7557

D. Transporter's Phone

7. Transporter 2 Company Name

8. Use EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

Systech Corporation
P.O. Box 485
Greencastle, IN 46135

10. Use EPA ID Number

I. N. D. 0. 0. 6. 4. 1. 9. 2. 1. 2

G. State Facility's ID

H. Facility's Phone
317/653-2606

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

RQ, Waste Flammable Liquid, N.O.S. UN 1993
(K048, K049, K050, K051, D018) (ERG #27)

12. Containers

No. Type

13. Total Quantity

14. Unit Wt/Vol.

I. Waste No.

No. Type

5 0 0 0

G

K048 K049
K050 K051
D018

a.

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

Wastewater sludge derived from wastewater that is discharged to a publicly owned treatment works.

K. Handling Codes for Materials Listed Above

15. Special Handling Instructions and Additional Information

In the Event of Chemical Emergency - Spill, Leak, Fire, Exposure, or Accident, call CHEMTREC 800-424-9300, Day or Night.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Pat Sorensen

Signature

Pat Sorensen

Month Day Year

11/29/90

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Roger J Murphy

Signature

Roger J Murphy

Month Day Year

11/29/90

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted Item 19.

Printed/Typed Name

STACEY A. MACKAY

Signature

Stacey A. Mackey

Month Day Year

11/29/90

In case of a spill call the Indiana Office of Environmental Response at 317/241-4336 (day or night) and the National Response Center at 800/424-8802 or 202/426-2675.

INA 0436870

LAND DISPOSAL RESTRICTION NOTIFICATION
Marathon Petroleum Co., Indiana Refining Division

EPA ID Number: IND006417430

Manifest Number: INA 0436870
Document Number: 02445

Waste Identification: Mixture of K048, K049, K050, K051 Nonwastewaters

Date Subject to Prohibition: Restricted waste allowed a National
Capacity Variance until November 8, 1990.Revised BDAT Treatment Standards - Constituent Concentrations in
Waste Extract (TCLP)

Chromium (Total)	1.7	mg/l
Nickel	0.20	mg/l

Revised BDAT Treatment Standards - Constituent Concentration in Waste

Anthracene	28.0	mg/kg	(K049, K051)
Benzene	14.0	mg/kg	(K048, K049, K051)
Benzo(a)anthracene	20.0	mg/kg	(K051)
Benzo(a)pyrene	12.0	mg/kg	(K048, K049, K050, K051)
Bis(2-ethylhexyl)phthal	7.3	mg/kg	(K048, K049, K051)
Chrysene	15.0	mg/kg	(K048, K049, K051)
Di-n-butyl phthalate	3.6	mg/kg	(K048, K051)
Ethylbenzene	14.0	mg/kg	(K048, K049, K051)
Napthalene	42.0	mg/kg	(K048, K049, K051)
Phenanthrene	34.0	mg/kg	(K048, K049, K051)
Phenol	3.6	mg/kg	(K048, K049, K050, K051)
Pyrene	36.0	mg/kg	(K048, K049, K051)
Toluene	14.0	mg/kg	(K048, K049, K051)
Xylenes (Total)	22.0	mg/kg	(K048, K049, K051)
Cyanides (Total)	1.8	mg/kg	(K048, K049, K050, K051)

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Pat Sorensen
Pat Sorensen Environmental Engineer

Signature	Title	Date
-----------	-------	------

10-14-90
Date

Facility: Marathon Petroleum Co., Indiana Refining Division
 U.S. EPA I.D. No.: IND 006417430
 Street: 5000 West 86th Street, P.O. Box 68007
 City: Indianapolis State: IN Zip: 46268-0007
 Telephone: (317) 872-3200

Owner/Operator:

Street:

City:

State:

Zip:

Telephone:

Inspection Date:

Weather Conditions:

12/28/8912/29/89 Time: 10:45-A mcold, cloudy - snow covered ground

	Name	Agency/Title	Telephone
Inspectors:	<u>L. R. Schoenberger</u>	<u>IDEM</u>	<u>(317) 232-4314</u>

	Name	Agency/Title	Telephone
Facility Representative:	<u>William Laque</u>	<u>Env. Manager</u>	<u>(317) 872-3200</u>
	<u>Mr. Pat Lorenson</u>	<u>Env. Engineer</u>	<u>(317) 872-3200</u>

	Generate	Transport	Treat	Store	Dispose
F-Solvent	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dioxin	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
California List	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
First Third	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Second Third	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

INSPECTION SUMMARY

Processes That Generate LDR Wastes

LDR Waste Management

Summary

This facility is currently listed as a land disposal facility because of the former waste pile storage on goat hill and the land application disposal practices of the early 1980's. The waste pile is no longer present at goat hill, and the company is in the process of addressing soil contamination in this area. Because the facility has no current TSD activities that are active, the TSD form was not completed.

Revised 10-20-89

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☒ List* waste xylene

b. Dioxin-containing Wastes

Yes ☐ No ☒ List* _____

c. California List Wastes

Yes ☒ No ☐ List* acidizing waste (D002) and cooling tower sludge (D007), D001 with HOC

d. First and Second Third Wastes

Yes ☒ No ☐ List* K049, K050, K051

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☒ No ☐ Comments ~~K048~~, K049, K050, K051

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☒ No ☐ Comments same as above

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☒ Comments _____

LIST OF RESTRICTED WASTES

CODES: Asterisk (*) = U.S. EPA has established treatment standards or prohibition levels.
 No asterisk = Soft hammer wastes.
Underlined = Potential California List applicability.
Bold Print = Final third and newly listed wastes.
 NWW = Non-wastewater
 WW = Wastewater

Gen/Trans/Treat/Store/Disp	Gen/Trans/Treat/Store/Disp	Gen/Trans/Treat/Store/Disp
F001*	F011*	K037*
F002*	F012*	K038*
F003*	F019	K039*
F004*	F024*	K040*
F005*	K001*	<u>K041</u>
F020*	K004	<u>K042</u>
F021*	K005 (NWW)*	K043*
F022*	K007 (NWW)*	K044*
F023*	K008	K045*
F026*	K009*	K046
F027*	K010*	(NWW - nonreactive)*
F028*	K011(NWW)*	(NWW - reactive)
Liquid Hazardous Wastes With:	(WW)	(WW)
As*	K013(NWW)*	K047*
(500 mg/l)	(WW)	K048*
Cd*	K014(NWW)*	K049*
(100 mg/l)	(WW)	K050*
Cr VI*	K015(WW)*	K051*
(500 mg/l)	K016*	K052*
Pb*	<u>K017</u>	K060(NWW)*
(500 mg/l)	K018*	(WW)
Hg*	K019*	K061
(20 mg/l)	K020*	(NWW - low sinc)*
Ni*	K021(NWW)*	(NWW - high sinc)*
(134 mg/l)	(WW)	(WW)
Se*	K022(NWW)*	K062*
(100 mg/l)	(WW)	K069
Ti*	K023*	(NWW - nonCaSO ₄)*
(130 mg/l)	K024*	(NWW - CaSO ₄)
pH* ≤ 2.0	K025(NWW)*	(WW)
PCBs*	(WW)	K071*
≥ 50 ppm	K027*	<u>K073</u>
Hazardous Wastes with:	K028*	K083 (WW)
HOCs*	K029(NWW)*	<u>K084</u>
≥ 1,000 mg/l	(WW)	<u>K085</u>
≥ 1,000 mg/kg	K030*	
F006 (NWW)*	<u>K031</u>	
(WW)	<u>K035</u>	
F007*	K036*	
F008*		
F009*		
F010*		

Gen/Trans/Treat/Store/Disp
K086
(NWW -
Sol Wash)*
(WW -
Sol Wash)*
(NWW -
Sol Sludge)
(WW -
Sol Sludge)
(NWW -
Caustic/Water
(WW -
Caustic/Water)
K087*
K093*
K094*
K095 (NWW)*
(WW)
K096 (NWW)*
(WW)
K097
K098
K099*
K100 (NWW)*
K101
(NWW -
low As)*
(NWW -
high As)
(WW)*
K102
(NWW -
low As)*
(NWW -
high As)
(WW)*
K103*
K104*
K105
K106
K113*
K114*
K115*
K116*
P001
P002
P003
P004

Gen/Trans/Treat/Store/Disp
P005
P007
P008
P010
P011
P012
P013*
P014
P015
P016
P018
P020
P021*
P026
P027
P029*
P030*
P036
P037
P039*
P040*
P041*
P043*
P044*
P048
P049
P050
P054
P057
P058
P059
P060
P062*
P063*
P066
P067
P068
P069
P070
P071*
P072
P074*
P081
P082
P084
P085*

Gen/Trans/Treat/Store/Disp
P087
P089*
P092
P094*
P097*
P098*
P099*
P102
P104*
P105
P106*
P107
P108
P109*
P110
P111*
P112
P113
P114
P115
P120
P121*
P122
P123
U002
U003
U005
U007
U008
U009
U010
U011
U012
U014
U015
U016
U018
U019
U020
U021
U022
U023
U025
U026

Gen/Trans/Treat/Store/Disp
U028*
U029
U031
U032
U035
U036
U037
U041
U043
U044
U046
U047
U049
U050
U051
U053
U057
U058*
U059
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U061
U062
U063
U064
U066
U067
U069*
U070
U073
U074
U077
U078
U080
U083
U086
U087*
U088*
U089
U092
U093
U094
U095
U097
U098
U099
U101

Gen/Trans/Treat/Store/Disp
U102*
U103
U105
U106
U107*
U108
U109
U110
U111
U114
U115
U116
U119
U122
U124
U127
U128
U129
U130
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U164
U165
U168
U169

Gen/Trans/Treat/Store/Disp
U170
U171
U172
U173
U174
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U180
U185
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U189
U190*
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U193
U196
U200
U203
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U211
U213
U214
U215
U216
U217
U218
U219
U220
U221*
U223*
U226
U227
U228
U235*
U237
U238
U239
U244
U248
U249

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐No ☒NA ☒*Xylene*

If yes, check the appropriate treatability group.

☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)

☐ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐No ☒NA ☐

If yes, list the waste code and check the correct treatability group.

Waste Code

Wastewater

Non-wastewater

*K049, K050, K051**going to Lytech and Copley Cement Co.'s.*~~*H002*~~~~*H001 (SK-105)*~~

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐No ☐NA ☒

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐ No ☐ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☐ No ☒ NA ☐ *sent to Safety Klean for reclamation*

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☐ No ☒ Comments _____

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐ No ☐ Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☐

No ☒ *For K049, K050, K051 going to Coplay Cement + dyestuff*

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☒ No ☐

- TCLP Yes ☐ No ☒ NA ☐

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- Total constituent analysis Yes ☐ No ☒ NA ☐

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- pH \leq 2 Yes ☒ No ☒ NA ☐

List the wastes for which pH testing was used.

monitored as 15002 but they claim pH was not less than or equal to 2. (acidizing waste)

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☒

List the wastes for which PFLT was used.

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☒ NA ☐

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☒ Comments _____

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
D001	Safety Kleen, Hebron Ohio	
D007	HES, Indianapolis	
K049, K050, K051	Coploy Cement, Lystech	burning as H.W. fuel
P002	HES, Lystech	

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☐ No ☒ for D007, K049, K050, K051 going to Coploy and Lystech ~~for K049, K050, K051~~

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☐ No ☐

Applicable treatment standards and prohibition levels Yes ☐ No ☐

Manifest number Yes ☐ No ☐

Waste analysis data, if available Yes ☐ No ☐

Note: notif
for D001 to
Safety Kleen is
on the
manifest

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ___ No ___

Applicable treatment standards and prohibition levels Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ___ No ___

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ___ No ☒ (If no, go to d)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number Yes ___ No ___

The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Date the waste is subject to the prohibitions Yes ___ No ___

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ___ No ☒ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes ___	No ___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes ___	No ___
(iii)	Manifest number	Yes ___	No ___
(iv)	Waste analysis data, if available	Yes ___	No ___

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ☒

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ___ No ___

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes ___	No ___
Addresses	Yes ___	No ___
Telephone numbers	Yes ___	No ___
Contact dates	Yes ___	No ___
Certification statement	Yes ___	No ___

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☐ No ☐ NA ☐

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☐ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☐ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☐ No ☐ NA ☐

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ☐ Comments for K049, K050 + K051 sent
to Adams Center Landfill.

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☒ No ☐ Comments K049, K050 + K051

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☐ NA ☐ Comments unknown Adams Center

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☒ No ☐

not burned on site

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
K049, K050 K051	furnace, burning as H.W. fuel by Gifford and Systech	

2. Are treatment residuals generated from these units?

Yes ☐ No ☐ Comments _____

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☐ NA ☐ Comments _____

If yes, the TSD checklist must be completed.

TSD - RCRA INSPECTION REPORT

EPA ID # IND006417430 NAME Marathon Petroleum Co.
MAILING ADDRESS: P. O. Box 68007 Indiana Refining Division
5000 West 86th Street
Indianapolis, IN 46268-0007
LOCATION ADDRESS: same

CONTACT: Mr. William Laque PHONE: 317/872-3200
OWNERSHIP: Marathon Petroleum COUNTY: Marion

STATUS CODE: 1 1=Active 3=Dead Mail 4=PCB handler
6=non-handler 2=Obsolete ID # 9=Superfund site
5=Out of business

ACTIVITY: (This should reflect the actual functioning of the facility)

LQG ☒ SQG ☐ CEG ☐ TRANSPORTER ☐ TSD ☒ UI ☐

TRANSPORTERS: Air ☐ Rail ☐ Hwy ☐ Water ☐ Other ☐

HAZARDOUS WASTE FUEL : Gen mktg burner ☐ other mktr ☐ burner ☐
OFF SPEC USED OIL FUEL : Gen mktg burner ☐ other mktr ☐ burner ☐
SPEC USED OIL FUEL MKTR : ☐
BURNING DEVICE : Util boiler ☐ Indus boiler ☐ Indus furn ☐

Person(s) interviewed: Title: Telephone:
Mr. William Laque Env. Manager (317) 872-3200
Mr. Pat Lorenson Env. Engineer (317) 872-3200

Inspector(s): Agency: Telephone:
Mr. Lewis R. Schenberger IDE M (317) 232-4314

Date of inspection: 12/28/89 Time of inspection: 10:45 Am
12/29/89

Installation Processes by Process Code (EPA Form 3510-3)

S01 <input type="checkbox"/> Container storage	T03 <input type="checkbox"/> Incinerator treatment
S02 <input type="checkbox"/> Tank storage	T04 <input type="checkbox"/> Other treatment
S03 <input checked="" type="checkbox"/> Waste pile storage	D79 <input type="checkbox"/> Injection well disposal
S04 <input type="checkbox"/> Surface impoundment storage	D80 <input type="checkbox"/> Landfill disposal
T01 <input type="checkbox"/> Tank treatment	D81 <input checked="" type="checkbox"/> Land application disposal
T02 <input type="checkbox"/> Surface impoundment treatment	D83 <input type="checkbox"/> Surface impoundment disposal

If Part A process codes are listed above as T04 please describe the process involved below:

- 1) Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application. (HWIMS 610) *Close waste piles at goat hill and near tank 4001*
- 2) Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.
- 3) Type of Operation, Products Manufactured, Processes Utilized, Size of Operation, Concentrate on processes that produce waste (hazardous or non-hazardous)!

Refine crude oil into gases, gasoline, kerosene, #2 fuel oil, aviation gasoline, aviation jet A kerosene, and heavy oils

- 4) If any of the wastes are managed in the manners listed below, please check those areas and utilize the provided appendices.

	<u>YES</u>	<u>NO</u>
A) Waste Oil Fuel - Appendix A	<input type="checkbox"/>	<input checked="" type="checkbox"/>
B) Lead Acid Batteries - Appendix B	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C) Hazardous Waste Fuel - Appendix C	<input type="checkbox"/>	<input checked="" type="checkbox"/>
D) Precious Metals - Appendix D	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E) Use Constituting Disposal - Appendix E	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
F) Tanks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
G) Use and Management of Containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>

NO

☒ **Yes**

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Disposition

$\sim 434 \text{ lb/mo}$

Disposition
Safety Plan, Helron
094.

~ 28,000 gal/3 yr

m H E S, Indpls
Copying and Dystech

olive filter

~ 140 tons!

Copies and System
Adams Center

Acidizing tower

$\sim 77,000 \text{ gal}/3 \text{ m}$

9 E 5, Indpls

crude oil tank

28,000 lbs 0

55

alkylating unit.

72 gul
770

11

Paint shop.

Put into APT separately
+ goes to Adams Anti.

Disposition

Waste

$\sim 75 \text{ tons/mo.}$

solved on L.F. d.
at Danville

residual oil supercritical
extraction.

asphalt materials normal

- 7) If the company claims a reuse or reclaim exemption please include the following information:

	Waste Type	Generation Rate	How reclaimed & by Who	Quantity stored on Site
A.	<u>N/A</u>			
B.				

8) Hazardous Waste
On-Site

	Amount	How Stored	Comments
<u>K049, K050, K051</u>	<u>undetermined</u>	<u>1/2 of a 10,000 gal tank</u>	

- 9) Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.
329 IAC 3-38-2 (HWIMS 610)

no

- 10) Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred)
(40 CFR 270.13 and 329 IAC 3-34-4) (HWIMS 610)

503

- 11) Is the Biennial Report Accurate?

IN. Biennial report for 1987 not filled out

- 12) Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.)

spillage of oil from a
1 cubic yard container near fire building #3

13) Additional Comments:

Marathon Petroleum Co (MPC) has recently ~~entered into an agreed order with the USEPA~~ been cited for violations by ~~entered into an agreed order with the USEPA~~ concerning case V-W-88 R U 38. Because a number of the items ~~listed~~ covered in this inspection are being addressed in the above action, they were not addressed during this inspection.

General Facility Standards (paperwork)

		<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
1)	Has the Regional Administrator/Environmental Management Board been notified regarding:				
a.	Receipt of hazardous waste from a foreign source? <u>40 CFR 265.12(a) (329 IAC 3-16-3) (HWIMS 300)</u>	—	—	—	✓
b.	Facility expansion? <u>40 CFR 270.72(b) (329 IAC 3-38-3) (HWIMS 610)</u>	—	—	—	✓
c.	Change of owner or operator? <u>40 CFR 265.12(b) (329 IAC 3-16-3) (HWIMS 300)</u>	—	✓	—	class =

2) General Waste Analysis: (HWIMS 310)

a.	Has the owner or operator made a detailed chemical and physical analysis of the waste either through testing of knowledge of the process? <u>40 CFR 265.13(a)1 (329 IAC 3-16-4)</u>	✓	—	—	—
b.	Does the owner or operator have a detailed waste analysis plan on file at the facility? <u>40 CFR 265.13(b) (329 IAC 3-16-4)</u>	✓	—	—	—
	Does the waste analysis plan contain:				
	1. parameters (and rationale for their choice)	—	✓	✓	—
	2. test methods	—	✓	✓	—
	3. sampling method for representative sample	—	✓	✓	—
	4. frequency of analysis (and rationale)	—	✓	✓	—
	5. <u>off-site only</u> : waste analysis from generators	—	✓	✓	—
	6. Additional waste analysis needed (when a change in waste type or process occurs)	—	—	—	—
a.	<u>265.193 (329 IAC 3-24-3) Tanks</u> (see above)	—	—	—	✓
b.	<u>265.225 (329 IAC 3-25-4) Impoundment</u> (same as above)	—	—	—	✓
c.	<u>265.252 (329 IAC 3-26-3) Waste Pile</u> (same as above)	—	✓	✓	—
d.	<u>265.273 (329 IAC 3-27-3) Land Treatment</u> (same as above)	—	✓	✓	—
e.	<u>265.341 (329 IAC 3-29-2) Incinerators</u> (same as above)	—	—	—	✓

		OK	DF	NI	NA
f.	<u>265.375 (329 IAC 3-30-3) Thermal Treatment</u> (same as above)	—	—	✓	—
g.	<u>265.402 (329 IAC 3-31-3) Other Treatment</u> (same as above)	—	—	✓	—

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?
40 CFR 265.13(c) (329 IAC 3-16-4) — — — ✓

d. Is the waste analysis plan followed? N/I

3) Owner or Operator Inspections: (HWIMS 320)

a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?
40 CFR 265.15(a) (329 IAC 3-16-6) ✓ — — —

b. Does the owner or operator have an inspection schedule at the facility?
40 CFR 265.15(b)2 (329 IAC 3-16-6) ✓ — — —

c. If so, does the schedule address the inspection of the following items:
40 CFR 265.15(b)1 (329 IAC 3-16-6)

i. monitoring equipment? — — — ✓

ii. safety and emergency equipment? — ✓ *OK* — *check*

iii. security devices (including fences)? ✓ — — —

iv. operating and structural equipment (ie. dikes, pumps, etc.)? ✓ — — —

v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)?
40 CFR 265.15(b)(2) (329 IAC 3-16-6) — — — *Problems weren't identified*

① Fire extinguishers are inspected by a contractor and aren't in the inspection schedule

	OK	DF	NI	NA
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? <u>40 CFR 265.15(b)(4) (329 IAC 3-16-6)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

vii. Must include:

- | | | | | |
|---|-------------------------------------|--------------------------|-------------------------------------|-------------------------------------|
| 1. Weekly container storage?
(See 265.174) (329 IAC 3-23-5) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Daily and Weekly Tank Storage?
(See 265.194) (329 IAC 3-24-4) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Daily freeboard and weekly dike inspection for surface impoundments?
(See 265.226) (329 IAC 3-25-5) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely)
[See 265.15(b)(4) (329 IAC 3-16-6)] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
- memo of 10/4/84 states they will inspect container acc. area daily, but this didn't occur on 12/20, 12/17, 12/16, 12/12 and some numerous other dates
- d. Does Owner or Operator follow the written inspection schedule as outlined?
265.15(b)(1) (329 IAC 3-16-6)
- e. Are areas subject to spills inspected daily when in use?
265.15(b)(4) (329 IAC 3-16-6)

f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections? ☒ ☐ ☐ ☐
40 CFR 265.15(d) (329 IAC 3-16-6)

g. Does the inspection log contain the following information:
40 CFR 265.15(d) (329 IAC 3-16-6)

i. the date and time of the inspection? ☒ ☐ ☐ ☐

ii. the name of the inspector? ☐ ☒ ☐ ☐

NPDGS inspectors not identified on 12/21 + 12/20 inspection

OK DF NI NA

iii. a notation of the observations made?

✓

iv. the date and nature of any repairs or remedial actions?

✓

4) Do personnel training records include: (HWIMS 330)

a. Job titles for the positions related to HWM
40 CFR 265.16(d)1 (329 IAC 3-16-7)

Bill still identified as
Eng + Env. Mgr., June 5 Com
still Coord. of Env. Affairs, not listed.
class? Eng not listed.
Put downson not

b. The name of the employees filling each job title?
40 CFR 265.16(d)1 (329 IAC 3-16-7)

class? listed ✓ as Env. Eng

c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position?
40 CFR 265.16(d)2 (329 IAC 3-16-7)

Lack Educational req. for
Eng + Env. Mgr. Lack all
descrip. for Area #4 grain
supr. ✓ Lack Educ. req.
for Fire Prot. & Safety work
and Labor Foreman, + area
supr.,
area 1 operators.

Check categories for which job titles/descriptions are available (please include the supervisors of each category in that category when reviewing documents).

Emergency coordinator Training coordinator Emergency response personnel
Inspectors Material handlers Container labelers Manifesters
Recordkeepers

d. Description of both introductory and continuing training required for each job?
40 CFR 265.16(d)3 (329 IAC 3-16-7)

✓ ①

Describe in general the type of training program in use at the facility.

① Currently subject to V-W-88 RU 38

e. Records of training required in (d)?
40 CFR 265.16(d)4 (329 IAC 3-16-7)

✓ ①

- f. Did facility personnel receive the required training including:

i) classroom or on the job

ii) within 6 months of hire

iii) annual review of training?

- g. Are all training records maintained for current personnel and for at least three years for former employees?

40 CFR 265.16(e) [329 IAC 3-16-7(e)]

OK	DF	NI	NA
—	—	✓	—
—	—	✓	—
—	—	✓	—
✓	—	—	—

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(HWIMS 350)

- 1) Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with 265.51 (3-18-2) and 265.56 (3-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable). ✓

A. A description of arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services. 329 IAC 3-18-3 ✓

i. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators? ✓

ii. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? ✓

40 CFR 265.52(e) (329 IAC 3-18-3)

doesn't list spill control equipment ✓

	OK	DF	NI	NA
iii. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) <u>40 CFR 265.52(f) (329 IAC 3-18-3)</u>	✓	—	—	—
2) Emergency Coordinator:				
a. Is the facility Emergency Coordinator identified? <u>40 CFR 265.52(d) (329 IAC 3-18-3)</u>	✓	—	—	—
b. Is coordinator familiar with all aspects of site operation and emergency procedures? <u>40 CFR 265.55 (329 IAC 3-18-6)</u>	✓	—	—	—
c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? <u>40 CFR 265.55 (329 IAC 3-18-6)</u>	✓	—	—	—

Preparedness and Prevention

1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? <u>40 CFR 265.37 (329 IAC 3-17-7)</u>	(HWIMS 340)	✓	—	—	—
2) Are copies of the Contingency Plan available at the site and local emergency organizations? <u>40 CFR 265.53 (329 IAC 3-18-4)</u>	(HWIMS 350)	✓	—	—	—

3) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (329 IAC 3-18-7)?

(HWIMS 350)

*Class 1
Work order
wasn't started till 12/29*

for spill of K049, K050, K051 observed in the area around the charge pit for the accelerator. No action had been taken for the spillage observed around the containers in the accumulation area near tank 4001

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

1)	Use of Manifest System:	(HWIMS 360)				
			<u>OK</u>	<u>DF</u>	<u>NI</u>	<u>NA</u>
a.	Does the facility follow the procedures listed in 265.71 (3-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)		—	—	—	✓
b.	Are records of past shipments retained for three (3) years? <u>40 CFR 265.71(b)5 (329 IAC 3-19-2)</u>		—	—	—	✓
2)	Has the facility submitted copies of hazardous waste manifests to the Department within five (5) working days after receiving hazardous waste? (This requirements applies to both Indiana's and other states hazardous waste manifests)?		—	—	—	✓
3)	Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) <u>40 CFR 265.72 (329 IAC 3-19-3)</u>		—	—	—	✓
4)	Unmanifested Waste Reports: (applies only to Off-site facilities)					
a.	Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (3-8-1) without a manifest or shipping paper? <u>40 CFR 265.76 (329 IAC 3-19-7)</u>		—	—	—	✓
b.	If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.		—	—	—	✓
c.	Has the facility submitted 8700-13B (unmanifested waste report)?		—	—	—	✓
<hr/>						
5)	Closure/Post Closure					
a.	Is the closure plan available for inspection? <u>40 CFR 265.112(a) (329 IAC 3-21-3) (HWIMS 390)</u>		✓	—	—	—
b.	Is the post-closure plan available for inspection? (for disposal facilities only) <u>40 CFR 265.118(a) (329 IAC 3-21-8) (HWIMS 390)</u>		—	—	✓	—
c.	Has the closure cost and post closure cost estimate been revised annually to account for inflation. (HWIMS 400)		✓	—	—	—

6) Operating Record:

(HWIMS 370)

OK DF NI NA

a. Does owner or operator have a operating record?
40 CFR 265.73(a)

class 2 ✓ records
not available
for land application
or waste file

b. Does the owner or operator maintain an operating record that contains the following information?

i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (329 IAC 3-32-2)?
40 CFR 265.73(b)(1) (329 IAC 3-19-4)

— — ✓ —

Summarize how the facility tracks the method and date of TSD activity.

ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.)
40 CFR 265.73(b)(2) (329 IAC 3-19-4)

— — ✓ — ①

Summarize how the facility tracks the location and quantity of waste.

① Permit allowed for the land application of 4,000 cu. yds. of sludge

iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.)
40 CFR 265.73(b)(2) (329 IAC 3-19-4)

— — — ✓

iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections?
40 CFR 265.73(b)(3)(5)(6) (329 IAC 3-19-4)

✓ — — —

v. Reports detailing all incidents that required implementation of the Contingency Plan?
40 CFR 265.73(b)(4) (329 IAC 3-19-4)

✓ — — —

vi. All closure and post closure costs as applicable?
40 CFR 265.73(b)(7) (329 IAC 3-19-4)

✓ — — —

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- | | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> | |
|----|--|-------------------------------------|-----------|-----------|-----------|-------------------------------------|
| 1) | Has the owner or operator of the facility implemented a groundwater monitoring system?
<u>40 CFR 265.90(a) (329 IAC 3-20-1)</u> | <input checked="" type="checkbox"/> | | | | <i>installed wells 9/88 G.W.M.</i> |
| | (HWIMS 380) | <i>done</i> | | | | <i>is not conducted</i> |
| 2) | Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in <u>265.90(d) (329 IAC 3-20-1)</u> ? | | | | | |
| | (HWIMS 380) | | | | | <input checked="" type="checkbox"/> |
-
-
-

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

They're signing manifests in advance (weekly groups)
OK DF NI NA

Manifest Requirements:

(HWIMS 110)

- 1) Does the operator have copies of the manifest available for review?
 40 CFR 262.40 (329 IAC 3-10-1) ✓ — — —

- 2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period 758 for 1989
year to date

- 3) Do the manifest forms examined contain the following information.
 40 CFR 262.21 (329 IAC 3-8-1) *Manifests lacking doc. no.*
IN A 0403366
 - a. Manifest document number? EPA ID No. + Unique 5 digit No.?
 (A sequential number for all manifests before September 20, 1984, and a five digit unique number after September 20, 1984.) — ✓ — loss!

 - b. Name, mailing address, telephone number, and EPA ID number of generator? ✓ — — —

 - c. Name, telephone number (3-14-3) and EPA ID Number of Transporter(s)? ✓ — — —

 - d. Name, Address, telephone number (3-14-3) and EPA ID Number of designated permitted facility? ✓ — — —

 - e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? ✓ — — —

 - f. The total quantity of waste(s) and the type and number of containers loaded? ✓ — — —

 - g. Required certification? ✓ — — —

 - h. Required signatures? ✓ — — —

 - i. EPA hazardous waste number (3-14-3)? ✓ — — —

OK DF NI NA

- 4) For hazardous waste shipments to Indiana facilities (or hazardous waste shipments to states that do not supply manifests) has the generator used the Indiana Hazardous Waste Manifest?

329 IAC 3-8-2

☒ ☐ ☐ ☐

- 5) Has the generator submitted copies of hazardous waste manifests to the Department within five (5) working days after shipping hazardous waste? (This requirement applies to both Indiana's and other states hazardous waste manifests).

329 IAC 3-8-4

☒ ☐ ☐ ☐

- 6) Reportable exceptions:

40 CFR 262.42 (329 IAC 3-10-3)

(HWIMS 180)

- a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. *3 manifests I NA 0390756, 55, + 54*
- b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (329 IAC 3-10-3) to the Regional Administrator.

none 45 days hadn't expired

INTERNATIONAL SHIPMENTS:

(HWIMS 190)

OK DF NI NA

- 1) Has the installation imported or exported hazardous waste?

40 CFR 262.50 (329 IAC 3-11-1)

(If answered Yes, complete the following as applicable.)

☒ ☐ ☐ ☐

- a. Exporting hazardous waste; has a generator:

i. Notified the administrator in writing?

☐ ☐ ☐ ☒

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

☐ ☐ ☐ ☒

iii. Met the Manifest requirements?

☐ ☐ ☐ ☒

- b. Importing hazardous waste; has the generator met the manifest requirements?

☐ ☐ ☐ ☒

RECORDKEEPING AND REPORTING:

- | | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|-------|---|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| 1) | Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility?
<u>40 CFR 262.11 (329 IAC 3-7-2)</u> (HWIMS 100) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2) | Has the generator submitted biennial reports and exception reports as required?
<u>329 IAC 3-10-2 and 329 IAC 3-10-3</u> (HWIMS 180/360) | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <u>Miss 2</u> |
| 3) | Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
<u>40 CFR 262.40 (329 IAC 3-10-1)</u> (HWIMS 180) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <hr/> | | | | | |
| <hr/> | | | | | |
| <hr/> | | | | | |

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

Remember to take photos and document as well as possible all violations!!!

5015S

kaw

12/21/89

WASTE PILES

East Hill

40 CFR 265, Subpart L

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> | <u>NA</u> |
|---|------------|-----------|-----------|-----------|
| 1) Is wind dispersal of hazardous waste managed?
<u>40 CFR 265.251 (329 IAC 3-26-2)</u> | --- | --- | ✓ | --- |
| 2) Is the pile protected from precipitation and run-on
by some means (such as being under roof)?
<u>40 CFR 265.253(b) (329 IAC 3-26-4-(b)1)</u>
(IF NOT then go to number 3) | --- | --- | ✓ | --- |
| 3) Are liquids or wastes containing liquids placed in the
pile?
<u>40 CFR 265.253(b) (329 IAC 3-26-4-(b)2)</u>
(IF SO then go to number 3) | --- | <i>no</i> | --- | --- |
| | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
| 4) Does the facility maintain a proper
run-on control system?
<u>40 CFR 265.253(a)2 (329 IAC 3-26-4(a)2)</u> | --- | --- | ✓ | --- |
| 5) Does the facility maintain a proper run-off system?
<u>40 CFR 265.253(a)3 (329 IAC 3-26-4(a)3)</u> | --- | --- | ✓ | --- |
| 6) Are run-off and run-on collection and holding facilities
managed or emptied expeditiously after storms?
<u>40 CFR 265.253(a)4 (329 IAC 3-26-4(a)4)</u> | --- | --- | ✓ | --- |
| 7) If required, are reactive or flammable wastes handled
properly?
<u>40 CFR 265.256 & 257 (329 IAC 3-26-5 & 6)</u> | --- | --- | ✓ | --- |

Please describe the location of the pile including data pertinent to regulatory status (ie. inside, outside)

Waste pile, as such, no longer exists. They are in the process of excavating the contaminated solid.

Please describe run-on and run-off control activities.

OK NO NI NA

- 1) Security - Do security measures include:
(If applicable)

See 40 CFR 265.14 (329 IAC 3-16-5) for the following

- a. 24-hour surveillance?
or
b. i. Artificial or natural
barrier around facility?
and
ii. Controlled entry?
c. Danger sign(s) at entrance?

✓

✓

✓

✓

Preparedness and Prevention:

Part 265 Subpart C

- 2) Maintenance and Operation of Facility

- a. Is there any evidence of fire, explosion, or release
of hazardous waste or hazardous waste constituent?
40 CFR 265.31 (329 IAC 3-17-2)

*Class 1
yes at K049, K050,
K051 change put*

- 3) If required, does the facility have
the following equipment:

- a. Internal communications or alarm systems?
40 CFR 265.32(a) & 40 CFR 265.34(a) (329 IAC 3-17-3 & 5)
b. Telephone or 2-way radios at the scene of operations?
40 CFR 265.32(b) & 40 CFR 265.34(b) (329 IAC 3-17-3 & 5)
c. Portable fire extinguishers, fire control, spill
control equipment and decontamination equipment?
Are water hoses, foam equipment, automatic sprinklers
or water spray equipment available? (Please specify)
40 CFR 265.32(c) (329 IAC 3-17-3(c))

✓

✓

✓

OK DF NI NA

- 4) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?

40 CFR 265.34(a) (329 IAC 3-17-5)

✓ — — —

5) Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

40 CFR 265.33 (329 IAC 3-17-4)

✓ — — —

- b. Is emergency equipment maintained in operable condition?

40 CFR 265.33 (329 IAC 3-17-4)

✓ — — —

- 6) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)

40 CFR 265.35 (329 IAC 3-17-6)

✓ — — —

WASTE PILES

area near Tank 4001

40 CFR 265, Subpart L

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> | <u>NA</u> |
|---|------------|-------------------------------------|-------------------------------------|-----------|
| 1) Is wind dispersal of hazardous waste managed?
<u>40 CFR 265.251 (329 IAC 3-26-2)</u> | — | — | <input checked="" type="checkbox"/> | — |
| 2) Is the pile protected from precipitation and run-on
by some means (such as being under roof)?
<u>40 CFR 265.253(b) (329 IAC 3-26-4-(b)1)</u>
(IF NOT then go to number 3) | — | — | <input checked="" type="checkbox"/> | — |
| 3) Are liquids or wastes containing liquids placed in the
pile?
<u>40 CFR 265.253(b) (329 IAC 3-26-4-(b)2)</u>
(IF SO then go to number 3) | — | <input checked="" type="checkbox"/> | — | — |
| | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
| 4) Does the facility maintain a proper
run-on control system?
<u>40 CFR 265.253(a)2 (329 IAC 3-26-4(a)2)</u> | — | — | <input checked="" type="checkbox"/> | — |
| 5) Does the facility maintain a proper run-off system?
<u>40 CFR 265.253(a)3 (329 IAC 3-26-4(a)3)</u> | — | — | <input checked="" type="checkbox"/> | — |
| 6) Are run-off and run-on collection and holding facilities
managed or emptied expeditiously after storms?
<u>40 CFR 265.253(a)4 (329 IAC 3-26-4(a)4)</u> | — | — | <input checked="" type="checkbox"/> | — |
| 7) If required, are reactive or flammable wastes handled
properly?
<u>40 CFR 265.256 & 257 (329 IAC 3-26-5 & 6)</u> | — | — | <input checked="" type="checkbox"/> | — |

Please describe the location of the pile including data pertinent to regulatory status (ie. inside, outside)

The waste pile is no longer present. This area
is now used as an accumulation area for the K049, K050, K051
sludge in containers

Please describe run-on and run-off control activities.

OK NO NI NA

- 1) Security - Do security measures include:
(If applicable)

See 40 CFR 265.14 (329 IAC 3-16-5) for the following

- | | | | | | |
|----|---|---|---|---|---|
| a. | 24-hour surveillance? | ✓ | — | — | — |
| | or | | | | |
| b. | i. Artificial or natural barrier around facility? | ✓ | — | — | — |
| | and | | | | |
| | ii. Controlled entry? | ✓ | — | — | — |
| c. | Danger sign(s) at entrance? | ✓ | — | — | — |

Preparedness and Prevention:

Part 265 Subpart C

- 2) Maintenance and Operation of Facility

- a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?
40 CFR 265.31 (329 IAC 3-17-2)

Check!
yes at K044, K050
+ K051 changeout

- 3) If required, does the facility have the following equipment:

- | | | | | | |
|----|--|---|---|---|---|
| a. | Internal communications or alarm systems?
<u>40 CFR 265.32(a) & 40 CFR 265.34(a) (329 IAC 3-17-3 & 5)</u> | ✓ | — | — | — |
| b. | Telephone or 2-way radios at the scene of operations?
<u>40 CFR 265.32(b) & 40 CFR 265.34(b) (329 IAC 3-17-3 & 5)</u> | ✓ | — | — | — |
| c. | Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?
Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify)
<u>40 CFR 265.32(c) (329 IAC 3-17-3(c))</u> | ✓ | — | — | — |

OK DF NI NA

- 4) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?
40 CFR 265.34(a) (329 IAC 3-17-5)

— — — —

5) Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
40 CFR 265.33 (329 IAC 3-17-4)

— — — —

- b. Is emergency equipment maintained in operable condition?
40 CFR 265.33 (329 IAC 3-17-4)

— — — —

- 6) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)
40 CFR 265.35 (329 IAC 3-17-6)

— — — —

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit near tank 4001

- | | <u>OK</u> | <u>DF</u> | <u>NI</u> | <u>NA</u> |
|--|---------------|---------------|---------------|-----------------|
| 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
<u>40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)</u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> ✓ |

- | | | | | |
|---|-----------------|-----------------|-----------------|---------------------------|
| 2) Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | <u> </u> | <u> </u> ✓ | <u> </u> | <u> </u> <i>less</i> |
| 3) Have more than 90 days elapsed since the date inspected in (a)?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | <u> </u> | <u> </u> | <u> </u> ✓ | <u> </u> |
| 4) Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | <u> </u> ✓ | <u> </u> | <u> </u> | <u> </u> |
| 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34 (329 IAC 3-9-5)</u> | <u> </u> ✓ | <u> </u> | <u> </u> | <u> </u> |

Satellite Accumulation
(HWIMS 120)

- | | | | | |
|--|---------------|---------------|---------------|-----------------|
| 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
<u>40 CFR 262.34 (329 IAC 3-9-5 (c))</u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> ✓ |
| 2) Are containers in good condition, compatible with the wastes in them and stored closed?
<u>40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))</u> | <u> </u> | <u> </u> | <u> </u> | <u> </u> ✓ |

Use and Management of Containers

Location of Unit near tank 4001

(HWIMS 160/410)

1/2 of a 10,000 gallon tank

OK DF NI NA

- 1) Are containers in good condition? ✓ class
- 2) Are containers compatible with waste in them? ✓
- 3) Are containers managed to prevent leaks? ✓ class
- 4) Are containers stored closed? ✓ class
- 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). ✓
- 6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) ✓
- 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? ✓
- 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
- a. Special handling? ✓
- b. No Smoking signs? ✓
- c. Separation and protection from ignition sources? ✓
- 9) Does the container storage area have adequate aisle space (about 2.5 feet)? ✓
- 10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection? ✓

Preparedness and Prevention

- 11) Security - Do security measures include: (HWIMS 300)
- a. 24- hour surveillance? or ✓
- b. Barrier around facility including controlled entry? ✓
- c. Danger sign(s) at entrance? ✓

- 12) Maintenance and Operation of Facility: (HWIMS 140/340, 810 spill)

- a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

yes at K049, K050,
K051 change Part and
Page
around this accumulation
Container

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

OK DF NI NA

- a. Internal communications or alarm systems?
b. Telephone or 2-way radios at the scene of operations?
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?
Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify)

✓
✓ radio hand held
✓ _____ _____ _____

14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?
(HWIMS 140/340)

✓
_____ _____ _____

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
b. Is emergency equipment in operable condition?
16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment?
(This applies to access for this equipment to reach hazardous waste management areas)

✓ _____ _____ _____
✓ _____ _____ _____
✓ _____ _____ _____

*TSD's Only

check for comments on back!

Use and Management of Containers

- 1) Are containers in good condition? 40 CFR 265.170 (329 IAC 3-23-1)
- 2) Are containers compatible with waste? 40 CFR 265.172 (329 IAC 3-23-3)
- 3) Containers managed to prevent leaks? 40 CFR 265.173(b) (329 IAC 3-23-4)
- 4) Are containers stored closed? 40 CFR 265.173(d) (329 IAC 3-23-4)
- 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (329 IAC 3-23-6)
- 6) Are incompatible wastes stored in separate containers? (If not provisions of 265.17(b) apply) 40 CFR 265.177(a) (329 IAC 3-23-7)
- 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (329 IAC 3-23-7)
- 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
 - a. Special handling?
 - b. No Smoking signs?
 - c. Separation and protection from ignition sources? 40 CFR 265.17(a) (329 IAC 3-16-8)
- 9) Does the container storage area have adequate aisle space (about 2.5 feet)? [329 IAC 3-23-4 (c)]
- 10) Can containers be inspected for leaks or deterioration without moving the containers [329 IAC 3-23-4 (c)]
- 11)*Security-Do security measures include:
 - a. 24- hour surveillance? or
 - b. Barrier around facility including controlled entry?
 - c. Danger sign(s) at entrance? 40 CFR 265.14 (329 IAC 3-16-5)
- 12) Maintenance and Operation of Facility
 - a. Is there any evidence of fire, explosion, or release of hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)
- 13) If required, does the facility have the following equipment:
 - a. Internal communications or alarm systems? 40 CFR 265.32 (a) & 40 CFR 265.34 (a) (329 IAC 3-17-3 & 5)
 - b. Telephone or 2-way radios at the scene of operations? 40 CFR 265.32 (b) & 40 CFR 265.34 (b) (329 IAC 3-17-3 & 5)
 - c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? 40 CFR 265.32(c)[329 IAC 3-17-3(c)]
- 14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? 40 CFR 265.34(a)[329 IAC 3-17-5]
- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment? 40 CFR 265.33 [329 IAC 3-17-4]
 - b. Is emergency equipment in operable condition? 40 CFR 265.33 [329 IAC 3-17-4]
- 16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35 [329 IAC 3-17-6]

*TSD's Only

Generator Accumulation Appendix
(HWIMS 120)

Location of Unit

Paint Shop

- 1) If waste is being shipped off-site is it properly packaged, labeled and marked per DOT regulations?
40 CFR 262.30-262.32 (329 IAC 3-9-1 to 3)

OK DF NI NA

— — — ✓

- 2) Is the container clearly marked with the start of accumulation date?
40 CFR 262.34 (329 IAC 3-9-5)

— ✓ — done!

- 3) Have more than 90 days elapsed since the date inspected in (a)?
40 CFR 262.34 (329 IAC 3-9-5)

— — ✓ —

- 4) Do wastes remain in accumulation tanks for more than 90 days?
40 CFR 262.34 (329 IAC 3-9-5)

— — ✓ —

- 5) Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
40 CFR 262.34 (329 IAC 3-9-5)

— ✓ — done!

① 1/2 drum of spent solvent

Satellite Accumulation
(HWIMS 120)

- 1) Are containers marked with the words "Hazardous Waste" or with other words identifying the contents?
40 CFR 262.34 (329 IAC 3-9-5 (c))

— ✓ — ✓

- 2) Are containers in good condition, compatible with the wastes in them and stored closed?
40 CFR 262.34 (329 IAC 3-23-2 & 3 & 4(a))

✓ — — ✓

Page

Use and Management of Containers

Location of Unit

Paint shop

(HWIMS 160/410)

- 1) Are containers in good condition?
- 2) Are containers compatible with waste in them?
- 3) Are containers managed to prevent leaks?
- 4) Are containers stored closed?
- 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive).
- 6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply)
- 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?
- 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
 - a. Special handling?
 - b. No Smoking signs?
 - c. Separation and protection from ignition sources?
- 9) Does the container storage area have adequate aisle space (about 2.5 feet)?
- 10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection?

OK

DF

NI

NA

Class!
has a rusted hole on side

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

✓

Class!
has a rusted hole on side

✓

Preparedness and Prevention

- 11) Security - Do security measures include: (HWIMS 300)
 - a. 24-hour surveillance? or
 - b. Barrier around facility including controlled entry?
 - c. Danger sign(s) at entrance?
- 12) Maintenance and Operation of Facility: (HWIMS 140/340, 810 spill)
 - a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

✓

✓

✓

yes

13) If required, does the facility have the following equipment:
(HWIMS 140/340)

OK DF NI NA

- a. Internal communications or alarm systems? ✓ — — —
b. Telephone or 2-way radios at the scene of operations? ✓ — — —
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?
Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? (Please specify) ✓ — — —

- 14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? ✓ — — —
(HWIMS 140/340)

Testing and Maintenance of Emergency Equipment

(HWIMS 140/340)

- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment? ✓ — — —
b. Is emergency equipment in operable condition? — ✓ — — *done!*

- 16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) ✓ — — —

① Fire extinguisher in Inspection Dept. bldg. needs to be recharged, and fire extinguisher near tank 3165 (Pole K103) was completely covered with ice

*TSD's Only

check for comments on back!

Use and Management of Containers

- 1) Are containers in good condition? 40 CFR 265.170 (329 IAC 3-23-1)
- 2) Are containers compatible with waste? 40 CFR 265.172 (329 IAC 3-23-3)
- 3) Containers managed to prevent leaks? 40 CFR 265.173(b) (329 IAC 3-23-4)
- 4) Are containers stored closed? 40 CFR 265.173(d) (329 IAC 3-23-4)
- 5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). 40 CFR 265.176 (329 IAC 3-23-6)
- 6) Are incompatible wastes stored in separate containers? (If not provisions of 265.17(b) apply) 40 CFR 265.177(a) (329 IAC 3-23-7)
- 7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? 40 CFR 265.177(c) (329 IAC 3-23-7)
- 8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
 - a. Special handling?
 - b. No Smoking signs?
 - c. Separation and protection from ignition sources? 40 CFR 265.17(a) (329 IAC 3-16-8)
- 9) Does the container storage area have adequate aisle space (about 2.5 feet)? [329 IAC 3-23-4 (c)]
- 10) Can containers be inspected for leaks or deterioration without moving the containers [329 IAC 3-23-4 (c)]
- 11)*Security-Do security measures include:
 - a. 24- hour surveillance? or
 - b. Barrier around facility including controlled entry?
 - c. Danger sign(s) at entrance? 40 CFR 265.14 (329 IAC 3-16-5)
- 12) Maintenance and Operation of Facility
 - a. Is there any evidence of fire, explosion, or release of hazardous waste constituent? 40 CFR 265.31 (329 IAC 3-17-2)
- 13) If required, does the facility have the following equipment:
 - a. Internal communications or alarm systems? 40 CFR 265.32 (a) & 40 CFR 265.34 (a) (329 IAC 3-17-3 & 5)
 - b. Telephone or 2-way radios at the scene of operations? 40 CFR 265.32 (b) & 40 CFR 265.34 (b) (329 IAC 3-17-3 & 5)
 - c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? Are water hoses, foam equipment, automatic sprinklers or water spray equipment available? 40 CFR 265.32(c)[329 IAC 3-17-3(c)]
- 14) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)? 40 CFR 265.34(a)[329 IAC 3-17-5]
- 15) a. Has the owner or operator established testing and maintenance procedures for emergency equipment? 40 CFR 265.33 [329 IAC 3-17-4]
 - b. Is emergency equipment in operable condition? 40 CFR 265.33 [329 IAC 3-17-4]
- 16) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas) 40 CFR 265.35 [329 IAC 3-17-6]

*TSD's Only

Appendix S
Spill Identification Checklist

1) What are the suspected wastes or products that have been spilled?

oil

2) Estimate the quantity of materials spilled if that information is available.

approximately 20 gallons

3) Using landmarks describe the location of the spill.

across the road from fire building #3

4) Draw a map of the spill area using one square to equal one foot unless more area is required. Include landmarks somewhere in the map with distances to two sides of the spill indicated. Use the map grid on the next page for the map.

5) Was a copy of the sampling and analysis plan handout left with representatives of the facility? YES___ NO ✓

Other Comments

Inspector signature Lewis R. Schoenberger

Facility Representative signature _____

page _____

area of village 13

avg 3.56



June 23

but down to earth

Appendix S
Spill Identification Checklist

1) What are the suspected wastes or products that have been spilled?

K049, K050, K051 sludge

2) Estimate the quantity of materials spilled if that information is available.

approximately 10 gallons.

3) Using landmarks describe the location of the spill.

spillage around the ~~first~~ container (1/2 of a tank)
used to accumulate the sludge near tank 4001

4) Draw a map of the spill area using one square to equal one foot unless more area is required. Include landmarks somewhere in the map with distances to two sides of the spill indicated. Use the map grid on the next page for the map.

5) Was a copy of the sampling and analysis plan handout left with representatives of the facility? YES ☐ NO ☒

Other Comments

Inspector signature Lewis R. Schoenberger

Facility Representative signature _____

page _____

PREINSPECTION FILES AUDIT
CHECKLIST

Kizer
→ Rick H.

DATE: 12/27/89

BY: L. R. Schenberger

Bill Laque

COMPANY: Rock Island Refinery

LOCATION: 5000 W. 86th St., Indianapolis

I.D.#: IND 1006 1417 1430

Type of inspection: G----T---(TSD)---Closure---Complaint---Other (please specify)

A. GENERAL

	YES	NO	NA
1. FEDERAL NOTIFICATION ON FILE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. FEDERAL PART A ON FILE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. CLOSURE PLAN REVIEWED?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. CONTINGENCY PLAN REVIEWED?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. BIENNIAL REPORT REVIEWED?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
*6. PART B PERMIT REVIEWED?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: (August 1985)
1987 biennial report
not present

B. NOTIFICATION DATA (Notify type, waste codes listed, etc.)

R049, K05D, K051

D002 (acidizing tower), D5001 (degumming)

C. LAND DISPOSAL INFORMATION

1. List Waste and Land Disposal Facility

fluid catalytic cracking unit catalyst. 1000 yd³/yr.
Rose Resin (1,500 yd³/yr)

D. LIST POSSIBLE WASTE STREAMS NOT LISTED ON BIENNIAL REPORT

E. LIST WASTE MANAGEMENT PRACTICES WHICH MAY REQUIRE A PERMIT

F. FEDERAL PART A (Handling Codes), OR PART B PERMIT

	<u>Code</u>	<u>Amount</u>	<u>Unit of Measure</u>	
1.	581	40 acres		
2.	T01 S02	3,456,000 gpd 6,000 gal		
3.	T04 T03	23,040 gpd 0.02 TPD		
4.	T01	1,640 gpd		
5.	T01 S02	3,456,000 gpd + 1,640 gpd 6,000 gal		

only activity remaining
+ S03 at goat hill + new tank 4001
11/19/89 Part A
Confirmed 9/16/86
2/27/85 Part A

Are there any discrepancies regarding multiple Part A submittals?

G. CLOSURE/POST CLOSURE

1. Any Closed Units: If yes, describe:

no. But EPA stated S.I.'s do not contain H.W. I DEM stated the T01 and S02 units are not H.W. management units per 329 IAC 3-33-1

H. COMPLIANCE HISTORY

List past two inspections and enforcement actions (CO, NOV, VL, WL)

<u>Date of inspection</u>	<u>Action type</u>	<u>Date of Action</u>
12/16/88	none	taken yet
11/12/87		KW-88-R038

I. LIST UNRESOLVED ENFORCEMENT ACTIONS/VIOLATIONS

V - W - 88 - R 038

J. BRIEFLY SUMMARIZE PREVIOUS VIOLATIONS. NOTE IF THEY ARE REPEATS.

K. LIST ANY ITEMS UNDER COMPLIANCE SCHEDULES WHICH ARE NOT YET COMPLETED OR
NEED FIELD VERIFIED

L. COMMENTS

0978M

kaw

8/4/88

Page _____

Appendix S
Spill Identification Checklist

1) What are the suspected wastes or products that have been spilled?

K049, K050, K051

2) Estimate the quantity of materials spilled if that information is available.

Difficult to determine. It appears to be ~~around~~ in
excess of 100 gallons.

3) Using landmarks describe the location of the spill.

Adjacent to the charge pit for the accelerator.
Between the pit and the accelerator

4) Draw a map of the spill area using one square to equal one foot unless more area is required. Include landmarks somewhere in the map with distances to two sides of the spill indicated. Use the map grid on the next page for the map.

5) Was a copy of the sampling and analysis plan handout left with representatives of the facility? YES ☐ NO ☒

Other Comments

Inspector signature Lewis Schoenberg

Facility Representative signature _____

page _____

B1

TSD RCRA Inspection Report

EPA Identification Number: IND 006417430
 Installation Name: Rock Island Refinery Corp
 Location Address: 5000 W. 86th Street
 City: Indianapolis ZIP 46268
 Date of Inspection: 11-12-87 Time of Inspection 9:15 AM

Person(s) interviewed *	Title	Telephone
<u>Jane O'Connor</u>	<u>Coordinator</u>	<u>317/872-3200</u>
<u>William E. Logue</u>	<u>Environmental Affairs</u> <u>Engineering & Environmental</u> <u>Managers</u>	<u>"</u>

Inspector(s)	Agency	Telephone
<u>Jeff Blankenberger</u>	<u>OSHWM / IDEM</u>	<u>317/232-4586</u>
<u>Steven Hunter</u>	<u>OSHWM / IDEM</u>	<u>317/232-4416</u>
<u>Doug Barty</u>	<u>OSHWM / IDEM</u>	<u>317/232-4300</u>

* Please identify correspondence contact

Installation Processes by Process Code (EPA Form 3510-3)

S01 <input type="checkbox"/> Container storage	S02 <input checked="" type="checkbox"/> Tank storage
S03 <input type="checkbox"/> Waste Pile storage	S04 <input type="checkbox"/> Surface impoundment storage
D79 <input type="checkbox"/> Injection well disposal	D80 <input type="checkbox"/> Landfill disposal
D81 <input type="checkbox"/> Land Application disposal	D83 <input type="checkbox"/> Surface Impoundment disposal
T01 <input type="checkbox"/> Tank Treatment	T02 <input type="checkbox"/> Surface Impoundment treatment
T03 <input type="checkbox"/> Incinerator treatment	T04 <input type="checkbox"/> Other

If Part A process codes are listed above as T04 please describe the process involved below.

Other activities

Generator ☒
 Appendix GN

Transporter ☐
 Appendix TR

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

1. Verify EPA I.D. No. _____

2. Type of Facility (G, T, TSD) based on inspection G, TSD

3. Type of Operation, Products Manufactured, Processes Utilized, Size of Operation. Concentrate on processes that produce waste (hazardous or non-hazardous)!

see trip report

4. Hazardous Waste Streams/EPA #

Source

Rate

Disposition

K049, K050

APL

787 tons/yr

Adams Center

KOS/ Vacuum filter

5/4/42

9 June / 42

1.

K352 leaded tank
bottoms

clean cut

6800 tons

HES

D002

Academy
Trust

East Cayote

Doyle writing

8380/60/42

Safety, Klean

2001

Mental Spirts

Cleaning

30 tons/yr

H. E. S.

2007

2007
Cooling tower Sludge

5. List all wastes not listed in number 4 such as spent materials, sludges, byproducts, scrap batteries and scrap metals. Check the appropriate category for each material found.

2

Wastes continued-

-----	-----	-----
-----	-----	-----
-----	-----	-----
-----	-----	-----
-----	-----	-----

Comments:

6. If the company claims a reuse or reclaim exemption please include the following information:

	Waste Type	Generation Rate	How reclaimed & by Who	Quantity stored on Site
A.	-----	-----	-----	-----
B.	-----	-----	-----	-----
C.	-----	-----	-----	-----
D.	-----	-----	-----	-----

7. If any of the wastes are reclaimed in the manners listed below please check those areas and utilize the provided appendices.

	<u>YES</u>	<u>NO</u>
A) Waste Oil Fuel- Appendix A	-----	-----
B) Lead Acid Batteries - Appendix B	-----	-----
C) Hazardous Waste Fuel - Appencix C	-----	-----
D) Precious Metals - Appendix D	-----	-----
E) Use Constituting Disposal - Appendix E	-----	-----

8. Hazardous Waste
On-Site

<u>Amount</u>	<u>How Stored</u>	<u>Comments</u>
K049, K050 K051	settling tank	

9. Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.
320 IAC 4.1-38-2

- NO -

10. Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred)

Stored H.W. K049, K050, K051 in waste piles from winter of '86-'87 to spring '87 on "goat hill" see diagram

11. Is the Annual Report Accurate? yes

12. List Transporters Used by the Company

Safety Kleen
Liquid Transport

13. Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.)

13. Additional Comments

Noted spillage of oily material around
area of East API Separator - north side.
Also noted spillage around sludge holding (Accelerator)
tank on west side as mentioned during the last
inspection (see diagram).

General Facility Standards (paperwork)

YES NO NI

1) Has the Regional Administrator/Environmental Management Board been notified regarding:

- | | | | | |
|----|--|---|----|---|
| a. | Receipt of hazardous waste from a foreign source?
40 CFR 265.12(a) (320 IAC 4.1-16-3) | — | NA | — |
| b. | Facility expansion?
40 CFR 270.72(b) (320 IAC 4.1-38-3) | — | ✓ | — |
| c. | Change of owner or operator?
40 CFR 265.12(b) (320 IAC 4.1-16-3) | — | NA | — |

1) b. waste pile storage

2) General Waste Analysis:

- | | | | | |
|----|--|---|---|---|
| a. | Has the owner or operator obtained a detailed chemical and physical analysis of the waste?
40 CFR 265.13(a)1 (320 IAC 4.1-16-4) | ✓ | — | — |
| b. | Does the owner or operator have a detailed waste analysis plan on file at the facility?
40 CFR 265.13(b) (320 IAC 4.1-16-4) | ✓ | — | — |

Does the waste analysis plan contain:

- | | | | | |
|----|--|---|----|---|
| 1. | parameters (and rationale for their choice) | — | ✓ | — |
| 2. | test methods | — | ✓ | — |
| 3. | sampling method for representative sample | — | ✓ | — |
| 4. | frequency of analysis (and rationale) | ✓ | — | — |
| 5. | off-site only: waste analysis from generators | — | NA | — |
| 6. | Additional waste analysis needed (when a change in waste type or process occurs) | | | |
| a. | 265.193 (320 IAC 4.1-24-3) Tanks
(see above) | ✓ | — | — |
| b. | 265.225 (320 IAC 4.1-25-4) Impoundment
(same as above) | — | NA | — |
| c. | 265.252 (320 IAC 4.1-26-3) Waste Pile
(same as above) | — | ✓ | — |
| d. | 265.273 (320 IAC 4.1-27-3) Land Treatment
(same as above) | — | NA | — |
| e. | 265.341 (320 IAC 4.1-29-2) Incinerators
(same as above) | — | ↓ | — |
| f. | 265.375 (320 IAC 4.1-30-3) Thermal Treatment
(same as above) | — | ↓ | — |
| g. | 265.402 (320 IAC 4.1-31-3) Other Treatment
(same as above) | — | ↓ | — |

2 b) 123 only reference parameters, test methods
sampling methods in plan

YES NO NI

- c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

40 CFR 265.13(c) (320 IAC 4.1-16-4)

NA

3) Owner or Operator Inspections:

- a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?

40 CFR 265.15(a) (320 IAC 4.1-16-6)

✓ — —

- b. Does the owner or operator have an inspection schedule at the facility?

40 CFR 265.15(b)2 (320 IAC 4.1-16-6)

✓ — —

- c. If so, does the schedule address the inspection of the following items:

40 CFR 265.15(b)1 (320 IAC 4.1-16-6)

- i. monitoring equipment?

✓ — —

- ii. safety and emergency equipment?

— ✓ —

- iii. security devices (including fences)?

— ✓ —

- iv. operating and structural equipment (ie. dikes, pumps, etc.)?

✓ — —

- v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)?

40 CFR 265.15(b)(2) (320 IAC 4.1-16-6)

✓ — —

- vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

40 CFR 265.15(b)(4) (320 IAC 4.1-16-6)

✓ — —

no schedule for
3c) safety + emergency equip. and security devices

YES NO NI

vii. Must include:

- | | | | |
|---|----------|-----------|----------|
| 1. Weekly container storage?
(See 265.174) (320 IAC 4.1-23-5) | — | <u>NA</u> | — |
| 2. Daily and Weekly Tank Storage?
(See 265.194) (320 IAC 4.1-24-4) | <u>✓</u> | — | — |
| 3. Daily freeboard and weekly dike inspection
for surface impoundments?
(See 265.226) (320 IAC 4.1-25-5) | — | — | <u>✓</u> |
| 4. Landfills, Thermal treatment, Chemical,
Physical, and Biological treatment should
be inspected as determined by deterioration
rate and daily at loading and unloading
areas (where spills are likely)
[See 265.15(b)(4) (320 IAC 4.1-16-6)] | — | <u>NA</u> | — |

- | | | | |
|--|----------|--------------------------------------|---|
| d. Does Owner or Operator follow the written inspection
schedule as outlined?
<u>265.15(b)(1) (320 IAC 4.1-16-6)</u> | <u>✓</u> | <u>actually</u>
<u>done daily</u> | — |
| e. Are areas subject to spills inspected
daily when in use?
<u>265.15(b)(4) (320 IAC 4.1-16-6)</u> | <u>✓</u> | <u>daily</u>
<u>log</u> | — |

~~3x daily inspection of freeboard.~~

- | | | | |
|--|----------|---|---|
| f. Does the owner or operator maintain an inspection
log or summary of owner or operator inspections?
<u>40 CFR 265.15(d) (320 IAC 4.1-16-6)</u> | <u>✓</u> | — | — |
| g. Does the inspection log contain the following information:
<u>40 CFR 265.15(d) (320 IAC 4.1-16-6)</u> | | | |
| i. the date and time of the inspection? | <u>✓</u> | — | — |
| ii. the name of the inspector? | <u>✓</u> | — | — |
| iii. a notation of the observations made? | <u>✓</u> | — | — |
| iv. the date and nature of any repairs or remedial
actions? | <u>✓</u> | — | — |

YES NO NI

4) Do personnel training records include:

- | | | | | |
|----|---|----------|----------|---|
| a. | Job titles for the positions related to HWM
<u>40 CFR 265.16(d)1 (320 IAC 4.1-16-7)</u> | <u>✓</u> | — | — |
| b. | The name of the employees filling each job title?
<u>40 CFR 265.16(d)(1) (320 IAC 4.1-16-7)</u> | <u>✓</u> | — | — |
| c. | Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position?
<u>40 CFR 265.16(d)2 (320 IAC 4.1-16-7)</u> | — | <u>✓</u> | — |
| d. | Description of both introductory and continuing training required for each job?
<u>40 CFR 265.16(d)(3) (320 IAC 4.1-16-7)</u> | — | <u>✓</u> | — |
| e. | Records of training required in (d)?
<u>40 CFR 265.16(d)4 (320 IAC 4.1-16-7)</u> | — | <u>✓</u> | — |
| f. | Did facility personnel receive the required training including: | | | |
| | i) classroom or on the job | <u>✓</u> | — | — |
| | ii) within 6 months of hire | <u>✓</u> | — | — |
| | iii) annual review of training? | <u>✓</u> | — | — |
| g. | Are <u>all</u> training records maintained for current personnel and for at least three years for former employees?
<u>40 CFR 265.16(e) [320 IAC 4.1-16-7(e)]</u> | <u>✓</u> | — | — |

c.) job description of Coordinator of Env. Affairs
does not include manifest preparation

d.) not for Coordinator of Env. Affairs and all
emergency coordinators

e.) same as d) above.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

YES NO NI

1) Does the Contingency Plan contain the following information:

- a. The actions facility personnel must take to comply with 265.51 (4.1-18-2) and 265.56 (4.1-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable). ☒ ☐ ☐
- b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services 320 IAC 4.1-18-3 ☒ ☐ ☐
- c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators? ☒ ☐ ☐
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
40 CFR 265.52(e) (320 IAC 4.1-18-3) ☐ ☒ ☐
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)
40 CFR 265.52(f) (320 IAC 4.1-18-3) ☒ ☐ ☐

2) Emergency Coordinator:

- a. Is the facility Emergency Coordinator identified?
40 CFR 265.52(d) (320 IAC 4.1-18-3) ☒ ☐ ☐
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
40 CFR 265.55 (320 IAC 4.1-18-6) ☒ ☐ ☐
- c. Does Emergency Coordinator have the authority to carry out the Contingency Plan?
40 CFR 265.55 (320 IAC 4.1-18-6) ☒ ☐ ☐

1 d) lack a brief outline of capabilities

Preparedness and Prevention

YES NO NI

- 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

40 CFR 265.37 (320 IAC 4.1-17-7)

✓

- 2) Are copies of the Contingency Plan available at the site and local emergency organizations?

40 CFR 265.53 (320 IAC 4.1-18-4)

✓

- 3) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (320 IAC 4.1-18-7)?

✓

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

- 4) Use of Manifest System:

- a. Does the facility follow the procedures listed in 265.71 (4.1-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

 NA

- b. Are records of past shipments retained for 3 years? 40 CFR 265.71(b)5 (320 IAC 4.1-19-2)

- 5) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only) 40 CFR 265.72 (320 IAC 4.1-19-3)

3) Operating Record:

YES NO NI

- a. Does owner or operator have a operating record?
40 CFR 265.73(a) ✓ — —
- b. Does the owner or operator maintain an operating record that contains the following information?
- i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (320 IAC 4.1-32-2)?
40 CFR 265.73(b)(1) (320 IAC 4.1-19-4) ✓ — —
- ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.)
40 CFR 265.73(b)(2) (320 IAC 4.1-19-4) ✓ — —
- iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.)
40 CFR 265.73(b)(2) (320 IAC 4.1-19-4) — NA —
- iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections?
40 CFR 265.73(b)(3)(5)(6) (320 IAC 4.1-19-4) ✓ — —
- v. Reports detailing all incidents that required implementation of the Contingency Plan?
40 CFR 265.73(b)(4) (320 IAC 4.1-19-4) — — —
- vi. All closure and post closure costs as applicable?
40 CFR 265.73(b)(7) (320 IAC 4.1-19-4) ✓ — —
-
-
-

- 4) Unmanifested Waste Reports:
(applies only to Off-site facilities)
- YES NO NI
- a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (4.1-8-1) without a manifest or shipping paper? 40 CFR 265.76 (320 IAC 4.1-19-7) NA
- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.
- c. Has the facility submitted 8700-13B (unmanifested waste report)?

6) Closure/Post-Closure:

- a. Is the closure plan available for inspection? 40 CFR 265.112(a) (320 IAC 4.1-21-3) ✓
- b. Is the post-closure plan available for inspection? (for disposal facilities only) 40 CFR 265.118(a) (320 IAC 4.1-21-8) NA

PHYSICAL FACILITY INSPECTION

YES NO NI

- 1) Security - Do security measures include:
(If applicable)

See 40 CFR 265.14 (320 IAC 4.1-16-5) for the following

- | | | | | |
|----|-----------------------------|----------|----------|----------|
| a. | 24- hour surveillance? | <u>✓</u> | <u>—</u> | <u>—</u> |
| | or | | | |
| b. | i. Artificial or natural | <u>✓</u> | <u>—</u> | <u>—</u> |
| | barrier around facility? | <u>✓</u> | <u>—</u> | <u>—</u> |
| | and | | | |
| | ii. Controlled entry? | <u>✓</u> | <u>—</u> | <u>—</u> |
| c. | Danger sign(s) at entrance? | <u>✓</u> | <u>—</u> | <u>—</u> |

Preparedness and Prevention:

Part 265 Subpart C

- 2) Maintenance and Operation of Facility

- a. Is there any evidence of fire, explosion, or release
of hazardous waste or hazardous waste constituent?
40 CFR 265.31 (320 IAC 4.1-17-2) ✓ — —

- 3) If required, does the facility have
the following equipment:

- a. Internal communications or alarm systems?
40 CFR 265.32(a) & 40 CFR 265.34(a) (320 IAC 4.1-17-3 & 5) ✓ — —
- b. Telephone or 2-way radios at the scene of operations?
40 CFR 265.32(b) & 40 CFR 265.34(b) (320 IAC 4.1-17-3 & 5) ✓ — —
- c. Portable fire extinguishers, fire control, spill
control equipment and decontamination equipment?
Are water hoses, foam equipment, automatic sprinklers
or water spray equipment available? (Please specify) ✓ — —
40 CFR 265.32(c) [320 IAC 4.1-17-3(c)]

2a) Noted spillage around East API and
associated pits. (see photos). Also, noted
spillage around holding tank at West API.

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|--|------------|-----------|-----------|
| 3) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?
<u>40 CFR 265.34(a) (320 IAC 4.1-17-5)</u> | <u>✓</u> | <u>—</u> | <u>—</u> |
| 4) Testing and Maintenance of Emergency Equipment: | | | |
| a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
<u>40 CFR 265.33 (320 IAC 4.1-17-4)</u> | <u>✓</u> | <u>—</u> | <u>—</u> |
| b. Is emergency equipment maintained in operable condition?
<u>40 CFR 265.33 (320 IAC 4.1-17-4)</u> | <u>✓</u> | <u>—</u> | <u>—</u> |
| 5) Does the owner or operator maintain adequate aisle space for the movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)
<u>40 CFR 265.35 (320 IAC 4.1-17-6)</u> | <u>✓</u> | <u>—</u> | <u>—</u> |
| <hr/> | | | |
| <hr/> | | | |
| <hr/> | | | |

Use and Management of Containers
 Note: use additional sheets
 if needed !

NA

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Are containers in good condition? <u>40 CFR 265.170 (320 IAC 4.1-23-1)</u>	—	—	—
2) Are containers compatible with waste in them? <u>40 CFR 265.172 (320 IAC 4.1-23-3)</u>	—	—	—
3) Are containers managed to prevent leaks? <u>40 CFR 265.173(b) (320 IAC 4.1-23-4)</u>	—	—	—
4) Are containers stored closed? <u>40 CFR 265.173(d) (320 IAC 4.1-23-4)</u>	—	—	—
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). <u>40 CFR 265.176 (320 IAC 4.1-23-6)</u>	—	—	—
6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) <u>40 CFR 265.177(a) (320 IAC 4.1-23-7)</u>	—	—	—
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? <u>40 CFR 265.177(c) (320 IAC 4.1-23-7)</u>	—	—	—
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a) (320 IAC 4.1-16-8)</u>			
a. Special handling?	—	—	—
b. No Smoking signs?	—	—	—
c. Separation and protection from ignition sources?	—	—	—
9) Does the container storage area have adequate aisle space (about 2.5 feet) <u>320 IAC 4.1-23-4 (c)</u>	—	—	—
10) Can containers be inspected for leaks or deterioration without moving the containers during the inspection? <u>320 IAC 4.1-23-4(c)</u>	—	—	—

Tanks
Note: use additional sheets
if needed !

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? <u>40 CFR 265.192(b) (320 IAC 4.1-24-2)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
2) Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? <u>40 CFR 265.192(c) (320 IAC 4.1-24-2)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
3) Do continuous feed systems have a waste-feed cut-off? <u>40 CFR 265.192(d) (320 IAC 4.1-24-2)</u>	<u>—</u>	<u>NA</u>	<u>—</u>
4) Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) <u>40 CFR 265.198 (320 IAC 4.1-24-6)</u>	<u>—</u>	<u>NA</u>	<u>—</u>
5) Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? <u>40 CFR 265.198(b) (320 IAC 4.1-24-6)</u>			
Tank capacity: _____ gallons			
Tank diameter: _____ feet			
Distance of tank from property line _____ feet			
(See table 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code -1977" to determine compliance.)			
6) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a) (320 IAC 4.1-16-8)</u>			
a. Special handling?	<u>—</u>	<u>NA</u>	<u>—</u>
b. No Smoking signs?	<u>✓</u>	<u>—</u>	<u>—</u>
c. Separation and protection from ignition sources?	<u>✓</u>	<u>—</u>	<u>—</u>

Surface Impoundments

40 CFR 265, Subpart K

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Do surface impoundments have at least 60 cm (2 feet) or freeboard? <u>40 CFR 265.222 (320 IAC 4.1-25-2)</u>	—	—	✓
2) Do earthen dikes have protective covers? <u>40 CFR 265.223 (320 IAC 4.1-25-3)</u>	—	—	—
3) Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) <u>40 CFR 265.229 (320 IAC 4.1-25-7)</u>	—	—	—
4) Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) <u>40 CFR 265.230 (320 IAC 4.1-25-8)</u>	—	—	—
5) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a) (320 IAC 4.1-16-8)</u>			
a. Special handling?	—	—	—
b. No Smoking signs?	—	—	—
c. Separation and protection from ignition sources?	—	—	✓

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|---|------------|-----------|-----------|
| 1) Has the owner or operator of the facility implemented a groundwater monitoring system?
<u>40 CFR 265.90(a) (320 IAC 4.1-20-1)</u> | ___ | ___ | ___✓ |
| 2) Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in <u>265.90(d) (320 IAC 4.1-20-1)</u> ? | ___ | ___ | ___✓ |

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

<u>Manifest Requirements:</u>	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Does the operator have copies of the manifest available for review? <u>40 CFR 262.40 (320 IAC 4.1-10-1)</u>	✓	—	—
2) Examine manifests for shipments ^{since 3/19/87} in past 6 months . Indicate approximate number of manifested shipments during that period	—	—	<u>42</u>
3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). <u>40 CFR 262.21 (320 IAC 4.1-8-1)</u>			
a. Manifest document number? (A sequential number for all manifests before September 20, 1984 and a five digit unique number after September 20, 1984.)	✓	—	—
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓	—	—
c. Name, telephone number (4.1-14-3) and EPA ID Number of Transporter(s)?	—	✓	—
d. Name, Address, telephone number (4.1-14-3) and EPA ID Number of designated permitted facility?	—	✓	—
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓	—	—
f. The total quantity of waste(s) and the type and number of containers loaded?	✓	—	—
g. Required certification?	✓	—	—
h. Required signatures?	✓	—	—
i. EPA hazardous waste number (4.1-14-3)?	—	✓	—

3 c.) Telephone number of transporter + TSD P

locking on manifest # 00080, + 00079

3 i.) improper EPA hazardous waste number manifest
number 49560

YES NO NI

4) Reportable exceptions:

40 CFR 262.42 (320 IAC 4.1-10-3)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. _____

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (320 IAC 4.1-10-3) to the Regional Administrator.

5) If required, are placards available to transporters of hazardous waste? _____

40 CFR 262.33 (320 IAC 4.1-9-4)

INTERNATIONAL SHIPMENTS:

1) Has the installation imported or exported hazardous waste? _____

40 CFR 262.50 (320 IAC 4.1-11-1)

(If answered Yes, complete the following as applicable.)

a. Exporting hazardous waste; has a generator:

i. Notified the administrator in writing? _____

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? _____

iii. Met the Manifest requirements? _____

b. Importing hazardous waste; has the generator met the manifest requirements? _____

PRE-TRANSPORT REQUIREMENTS:

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|--|------------|-----------|-----------|
| 1) Is waste packaged in accordance with DOT regulations?
(required prior to movement of hazardous waste off-site)
<u>40 CFR 262.30 (320 IAC 4.1-9-1)</u> | — | — | ✓ |
| 2) Are waste packages marked and labeled in accordance with
DOT regulations concerning hazardous waste materials?
(Required for movement of hazardous waste off-site)
<u>40 CFR 262.31-261.32 (320 IAC 4.1-9-2 & 3)</u> | — | — | ✓ |
-
-
-

3) On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b) (320 IAC 4.1-15-1)] or (B) in accordance with 40 CFR 262.34 (320 IAC 4.1-9-5) [see 265.1(c)(7) (320 IAC 4.1-15-1)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this blank ✓ and skip to RECORDKEEPING AND REPORTING. If the installation elects option B, complete the following observations:

Note: use additional sheets if needed !

- | | | | |
|---|---|---|---|
| a. Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
| b. Are <u>all</u> containers visible for inspection?
<u>40 CFR 262.34(a)(2) (320 IAC 4.1-9-5)</u> | — | — | — |
| c. Have more than 90 days elapsed since the date inspected in (a)?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
| d. Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
| e. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
-
-
-

YES NO NI

RECORDKEEPING AND REPORTING:

- | | | | |
|--|----------|------------|------------|
| 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility?
<u>40 CFR 262.11 (320 IAC 4.1-7-2)</u> | <u>✓</u> | <u> </u> | <u> </u> |
| 2) Have <u>all</u> all test results and analyses needed for hazardous waste determination been done? Are they retained on-site for at least three years?
<u>40 CFR 262.11 (4.1-7-2) & 40 CFR 262.40 (4.1-7-2)</u> | <u>✓</u> | <u> </u> | <u> </u> |
| 3) Has the generator submitted biennial reports and exception reports as required?
<u>320 IAC 4.1-10-2 and 320 IAC 4.1-10-3</u> | <u>✓</u> | <u> </u> | <u> </u> |
| 4) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
<u>40 CFR 262.40 (320 IAC 4.1-10-1)</u> | <u>✓</u> | <u> </u> | <u> </u> |
| <hr/> | | | |
| <hr/> | | | |
| <hr/> | | | |

NA

APPENDIX TR

SCOPE:

YES NO NI

- | | | | |
|--|-------|-------|-------|
| 1) Complete this Appendix if the owner or operator transports hazardous waste subject to <u>40 CFR 263.10 (320 IAC 4.1-10-1)</u> | _____ | _____ | _____ |
| 2) Does the transporter transport hazardous waste into the U.S. from abroad? | _____ | _____ | _____ |
| 3) Does the transporter transport hazardous waste out from the U.S.? | _____ | _____ | _____ |
| 4) Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? | _____ | _____ | _____ |

MANIFEST SYSTEM AND RECORDKEEPING:

- | | | | |
|---|-------|-------|-------|
| 1) Are copies of completed manifests available for review and retained for three years?
<u>40 CFR 263.22 (320 IAC 4.1-13-3)</u> | _____ | _____ | _____ |
| 2) Estimate the number of manifests for shipments completed during the past 6 months. | _____ | _____ | _____ |
| 3) Examine a representative number of manifests. Indicate number examined. | _____ | _____ | _____ |
| 4) Did the transporter properly sign and date the manifests examined?
<u>40 CFR 263.20 (320 IAC 4.1-13-1)</u> | _____ | _____ | _____ |
| 5) Do any manifests indicate shipments delivered to other than the designated facility? | _____ | _____ | _____ |
| (If (5) is "NO", skip 6 and 7.) | | | |
| 6) Do any manifests indicate shipments delivered to other than an alternate facility? | _____ | _____ | _____ |
| 7) Are shipments delivered to alternate facilities <u>only</u> because emergency prevents delivery to the designated facility?
<u>40 CFR 263.21 (320 IAC 4.1-13-2)</u> | _____ | _____ | _____ |

Appendix A
Used Oil Burned for Energy Recovery
Section I. is for marketers and Section II. for burners

NOTE: Only companies who market directly to burners, burn used oil themselves, or market to other marketers are regulated by this section, however, there are some exceptions.
See [266.41(b)(2)iii] and [320 IAC 4.1-32.5-12(b)(2)iii] and [266.43(a)] and [320 IAC 4.1-32.5-13(a)] for exceptions.

I. Marketers

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Has the marketer determined if the used oil fuel is specification or off-specification ? [266.43(b)1] and [320 IAC 4.1-32.5-14(b)1]	—	—	—
2) Has the marketer notified of his used oil fuel activity ? [266.43(b)3] and [320 IAC 4.1-32.5-14(b)3]	—	—	—

SPECIFICATION USED OIL FUEL ONLY

3) Is the record of analysis(or other information used to make the determination) kept by the marketer for three years ? [266.43(b)(6)i] and [320 IAC 4.1-32.5-14(b)(6)i]	—	—	—
4) Is a operating log maintained containing the following information;			
a. The name and address of the facility receiving the shipment ? [266.43(b)(6)(i)A] and [320 IAC 4.1-32.5-14(b)(6)(i)A]	—	—	—
b. The quantity of used oil fuel delivered ? [266.43(b)(6)(i)B] and [320 IAC 4.1-32.5-14(b)(6)(i)B]	—	—	—
c. The date of shipment delivery ? [266.43(b)(6)(i)C] and [320 IAC 4.1-32.5-14(b)(6)(i)C]	—	—	—
d. A cross reference to the used oil analysis information per number 3 above ? [266.43(b)(6)(i)D] and [320 IAC 4.1-32.5-14(b)(6)(i)D]	—	—	—

Comments:

OFF-SPECIFICATION USED OIL FUEL ONLY

	<u>YES</u>	<u>NO</u>	<u>NI</u>
5) Has the marketer provided an invoice to the burner for all used oil fuel shipments which contains the following information;			
a. An invoice number [266.43(b)(4)i] and [320 IAC 4.1-32.5-14(b)(4)i]	—	—	—
b. His EPA identification number as well as that of the receiving facility ? [266.43(b)(4)ii] and [320 IAC 4.1-32.5-14(b)(4)ii]	—	—	—
c. The names and addresses of the shipping and receiving facilities ? [266.43(b)(4)iii] and [320 IAC 4.1-32.5-14(b)(4)iii]	—	—	—
d. The quantity of off-specification used oil to be delivered ? [266.43(b)(4)iv] and [320 IAC 4.1-32.5-14(b)(4)iv]	—	—	—
e. The date(s) of shipment or delivery ? [266.43(b)(4)v] and [320 IAC 4.1-32.5-14(b)(4)v]	—	—	—
f. The statement "This used oil is subject to EPA regulation under 40 CFR Part 266" ? (Indiana Equivalent; 320 IAC 4.1-32.5) [266.43(b)(4)vi] and [320 IAC 4.1-32.5-14(b)(4)vi]	—	—	—
6) Has the marketer obtained a one-time certification from burner or other marketer prior to shipping any off-specification fuel that:			
a. The burner or marketer has notified for waste oil fuel activities ? [266.43(b)(5)(i)A] and and [320 IAC 4.1-32.5-14(b)(5)(i)A]	—	—	—
b. If the recipient is a burner that the waste will be burned only in approved industrial furnaces or boilers [See 266.41(b)] ? [266.34(b)(5)(i)B] and [320 IAC 4.1-32.5-14(b)(5)(i)B]	—	—	—
7) Has the marketer provided other marketers with certification of compliance with notification to the EPA of waste oil fuel activities ? [266.34(b)(5)(ii)] and [320 IAC 4.1-32.5-14(b)(5)(ii)]	—	—	—

II. Burners

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Has this facility notified as a Burner? (Note: some onsite burning is exempted as is burning specification fuel. Check for exemptions and answer numbers 3 and 4) [266.44(b)] and [320 IAC 4.1-32.5-15(b)]	—	—	—
2) Has the burner provided the marketer with a certification that he has notified of waste oil fuel activities and that he will burn only in approved furnaces or boilers ? [266.44(c)] and [320 IAC 4.1-32.5-15(c)]	—	—	—
3) If the burner is the generator has he obtained analyses to document claims that the oil is specification fuel not needing notification ? [266.44(d)1] and [320 IAC 4.1-32.5-15(d)1]	—	—	—
4) If the burner treats the oil to meet specification does he document the results through analyses or other documentation ? [266.44(d)2] and [320 IAC 4.1-32.5-15(d)2]	—	—	—
5) Are certification forms provided to marketers, invoices received from marketers and copies of analyses etc. required in numbers 3 and 4 above maintained on file for at least three years ? [266.44(e)] and [320 IAC 4.1-32.5-15(e)]	—	—	—

Comments:

Appendix C
Hazardous Waste Burned for Energy Recovery
Section I. is for marketers and Section II. for burners

I. Marketers

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Has this facility notified as a Marketer? [266.34(b)] and [320 IAC 4.1-32.5-9(b)]	—	—	—
2) Is the hazardous waste fuel stored as a hazardous waste ? [266.34(c)] and [320 IAC 4.1-32.5-9(c)]	—	—	—
3) Is the hazardous waste fuel shipped offsite with a manifest ? [266.34(d)] and [320 IAC 4.1-32.5-9(d)]	—	—	—
4) Has the marketer obtained a one-time certification from the burner or other marketer that;			
a. The burner or marketer has notified of their waste as fuel activities ? [266.34(e)(1)i] and [320 IAC 4.1-32.5-9(e)(1)i]	—	—	—
b. If the recipient is a burner that the waste will be burned only in approved industrial furnaces or boilers [See 266.31(a)(2)b] ? [266.34(e)(1)ii] and [320 IAC 4.1-32.5-9(e)(1)ii]	—	—	—
5) Has the marketer provided a one-time certification that he has notified of his waste as fuel activity prior to his first shipment of fuel to that another marketer ? [266.34(e)(2)] and [320 IAC 4.1-32.5-9(e)(2)]	—	—	—
6) Are all certifications received or sent by the marketer maintained at the site for at least three years ? [266.34(f)] and [320 IAC 4.1-32.5-9(f)]	—	—	—

Comments:

II. Burners

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Has this facility notified as a Burner? [266.35(b)] and [320 IAC 4.1-32.5-10(b)]	—	—	—
2) Is the hazardous waste fuel stored (or accumulated for generators who burn on site) as a hazardous waste ? [266.35(c)1 & 2] and [320 IAC 4.1-32.5-10(c)1 & 2]	—	—	—
3) Has the burner provided the marketer with a certification that he has notified of waste as fuel activites and that he will burn only in approved furnaces or boilers ? [266.35(d)] and [320 IAC 4.1-32.5-10(d)]	—	—	—
4) Are certification forms provided to marketers maintained on file for at least three years ? [266.35(e)] and [320 IAC 4.1-32.5-10(e)]	—	—	—

Comments:

Appendix E
Recyclable Materials Used in a
Manner Constituting Disposal
Determination Matrix

NOTE: These questions should be answered in order to get a proper interpretation !!!	<u>YES</u>	<u>NO</u>
1) Is this waste (material) applied to or placed on the land ? If NO then this material is not regulated by this subpart ! [266.20(a)] and [320 IAC 4.1-32.5-1(a)]	—	—
2) Is this waste (material) mixed with another substance ? If NO then this material is regulated ! [266.20(a)1] and [320 IAC 4.1-32.5-1(a)1]	—	—
3) After mixing does this waste undergo a chemical reaction so that the resultant mixture is inseparable from the other substance by physical means ? If YES then this is not regulated waste ! [266.20(a)2] and [320 IAC 4.1-32.5-1(a)2]	—	—
4) Is the material produced for the general public's use ? If NO then this material is regulated ! [266.20(a)3] and [320 IAC 4.1-32.5-1(a)3]	—	—
5) Is this material produced as a fertilizer for use by the general public ? If NO then this material is regulated ! [266.20(b)] and [320 IAC 4.1-32.5-1(b)]	—	—

TSD RCRA Inspection Report

EPA Identification Number: IND 006417430

Installation Name: Rock Island Refinery Corp.

Location Address: 5000 W. 86th Street

City: Indianapolis ZIP _____

Date of Inspection: 4/29/86 Time of Inspection All day

Person(s) interviewed *	Title	Telephone
<u>Bill Laque</u>	<u>Coordinator, Env. Affairs</u>	<u>317/872 3200</u> <u>Ext. 502</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency	Telephone
<u>David Koepper</u>	<u>DEM / HWMB</u>	<u>317/243-5107</u>
<u>Dan Derheimer</u>	<u>"</u>	<u>317/243-9100</u>

* Please identify correspondence contact

Installation Processes by Process Code (EPA Form 3510-3)

S01 <input type="checkbox"/> Container storage	S02 <input checked="" type="checkbox"/> Tank storage
S03 <input type="checkbox"/> Waste Pile storage	S04 <input type="checkbox"/> Surface impoundment storage
D79 <input checked="" type="checkbox"/> Injection well disposal	D80 <input type="checkbox"/> Landfill disposal
D81 <input checked="" type="checkbox"/> Land Application disposal	D83 <input checked="" type="checkbox"/> Surface Impoundment disposal
T01 <input type="checkbox"/> Tank Treatment	T02 <input checked="" type="checkbox"/> Surface Impoundment treatment
T03 <input type="checkbox"/> Incinerator treatment	T04 <input type="checkbox"/> Other

If Part A process codes are listed above as T04 please describe the process involved below.

Other activities

Generator ☒

Appendix GN

Transporter ☐

Appendix TR

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

1. Verify EPA I.D. No. CK

2. Type of Facility (G, T, TSD) based on inspection

3. Type of Operation, Products Manufactured, Processes Utilized,
Size of Operation. Concentrate on processes that produce waste
(hazardous or non-hazardous)!

Rock Island is a conventional petroleum refinery producing oils,
gasolines, kerosenes, asphalt and other distillation cuts
from crude oil. The company maintains a wastewater treatment
plant containing API separators, tanks, filters and lagoons. Calcium
sludge from process water softening is land farmed on various
areas in the tank farm.

4. Hazardous Waste

Streams/EPA #

Source

Rate

Disposition

K049 K050 K051	API/Oliver Filter Solids	API Separator	1000 ton t/yr	Adams Ctr. LF
D001	Spent Mineral Spirits	Maintenance degreasing	400 lbs/mo	Safety Kleen
D002	Spent Acid	Heat Acidizing Exchanger	5000 Gal.	ILWD
D007	Cooling Tower Basins Sludge	Bundles Cooling Tower clean out every 3 years	318.21 Tons 100,000 gal /3yrs. 75000 gal	"

5. Exempted/Excluded Hazardous Waste Streams and Reason for Exemption

6. Hazardous Waste
On-Site

Amount

How Stored

Comments

7. Has the capacity of the storage areas listed on the Part A exceeded that allowed? List the type and amount of actual storage capacity overages.

8. Indicate any TSD activities which have been omitted from or are not clear on the facility map (for the purpose of determining if expansion has occurred)

9. Is the Annual Report Accurate? NI

10. List Transporters Used by the Company

Safety Kleen

American Construction

11. Non-Hazardous
Waste Streams

Source

Rate

Disposition

<u>Lime Sludge</u>	<u>Water Soft.</u>		<u>Land Farmed</u>
<u>Steel</u>			<u>Reclaim</u>
<u>Cooling Tower Wood</u>			<u>Grant Co. LF</u>

Can the Company Document Questionable Waste Streams are
Non-Hazardous as Claimed?

12. Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.) _____

13. Additional Comments

- ① Tank at the east API separator area has not been used to store sludge.
- ② Rock Island has evidently taken some spent Stoddard Solvent and reused it in their process as an additive. American Constuction hauled the waste from Aratex & Means Services.

General Facility Standards (paperwork)

YES NO NI

1) Has the Regional Administrator/Environmental Management Board been notified regarding:

- | | | | | |
|----|--|-----|------------|-----|
| a. | Receipt of hazardous waste from a foreign source?
40 CFR 265.12(a) (320 IAC 4.1-16-3) | ___ | <u>N/A</u> | ___ |
| b. | Facility expansion?
40 CFR 270.72(b) (320 IAC 4.1-19-3) | ___ | <u>N/A</u> | ___ |
| c. | Change of owner or operator?
40 CFR 265.12(b) (320 IAC 4.1-16-3) | ___ | <u>N/A</u> | ___ |
-
-
-

2) General Waste Analysis:

- | | | | | |
|----|--|-----------------------|-----|-----|
| a. | Has the owner or operator obtained a detailed chemical and physical analysis of the waste?
40 CFR 265.13(a)1 (320 IAC 4.1-16-4) | <u>✓</u> | ___ | ___ |
| b. | Does the owner or operator have a detailed waste analysis plan on file at the facility?
40 CFR 265.13(b) (320 IAC 4.1-16-4) | <u>✓</u> ^① | ___ | ___ |

Does the waste analysis plan contain:

- | | | | | |
|----|--|-----|-----|-----|
| 1. | parameters (and rationale for their choice) | ___ | ___ | ___ |
| 2. | test methods | ___ | ___ | ___ |
| 3. | sampling method for representative sample | ___ | ___ | ___ |
| 4. | frequency of analysis (and rationale) | ___ | ___ | ___ |
| 5. | <u>off-site only</u> : waste analysis from generators | ___ | ___ | ___ |
| 6. | Additional waste analysis needed (when a change in waste type or process occurs) | ___ | ___ | ___ |
| a. | 265.193 (320 IAC 4.1-24-3) Tanks
(see above) | ___ | ___ | ___ |
| b. | 265.225 (320 IAC 4.1-25-4) Impoundment
(same as above) | ___ | ___ | ___ |
| c. | 265.252 (320 IAC 4.1-26-3) Waste Pile
(same as above) | ___ | ___ | ___ |
| d. | 265.273 (320 IAC 4.1-27-3) Land Treatment
(same as above) | ___ | ___ | ___ |
| e. | 265.341 (320 IAC 4.1-29-2) Incinerators
(same as above) | ___ | ___ | ___ |
| f. | 265.375 (320 IAC 4.1-30-3) Thermal Treatment
(same as above) | ___ | ___ | ___ |
| g. | 265.402 (320 IAC 4.1-31-3) Other Treatment
(same as above) | ___ | ___ | ___ |

① See inspection from 1/30/85 and correspondence.

- c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

40 CFR 265.13(c) (320 IAC 4.1-16-4)

— N/A —

3) Owner or Operator Inspections:

- a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?

40 CFR 265.15(a) (320 IAC 4.1-16-6)

— ✓ —

- b. Does the owner or operator have an inspection schedule at the facility?

40 CFR 265.15(b)2 (320 IAC 4.1-16-6)

— ✓ —

- c. If so, does the schedule address the inspection of the following items:

40 CFR 265.15(b)1 (320 IAC 4.1-16-6)

- i. monitoring equipment?

— ✓① —

- ii. safety and emergency equipment?

— ✓① —

- iii. security devices (including fences)?

— ✓① —

- iv. operating and structural equipment (ie. dikes, pumps, etc.)?

— ✓① —

- v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)?

40 CFR 265.15(b)(2) (320 IAC 4.1-16-6)

— ✓① —

- vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

40 CFR 265.15(b)(4) (320 IAC 4.1-16-6)

— ✓① —

① Oliver storage tank, surface impoundments, land application

YES NO NI

vii. Must include:

- | | | | | |
|----|--|---|---|----|
| 1. | Weekly container storage?
(See 265.174) (320 IAC 4.1-23-5) | — | — | ✓ |
| 2. | Daily and Weekly Tank Storage?
(See 265.194) (320 IAC 4.1-24-4) | — | ✓ | — |
| 3. | Daily freeboard and weekly dike inspection
for surface impoundments?
(See 265.226) (320 IAC 4.1-25-5) | — | ✓ | — |
| 4. | Landfills, Thermal treatment, Chemical,
Physical, and Biological treatment should
be inspected as determined by deterioration
rate and daily at loading and unloading
areas (where spills are likely)
[See 265.15(b)(4) (320 IAC 4.1-16-6)] | — | ✓ | — |
| d. | Does Owner or Operator follow the written inspection
schedule as outlined?
265.15(b)(1) (320 IAC 4.1-16-6) | — | — | ✓② |
| e. | Are areas subject to spills inspected
daily when in use?
265.15(b)(4) (320 IAC 4.1-16-6) | — | ✓ | — |

① Oliver storage tank is not shown in schedule

② Schedule does not address regulated areas (See latest NOD
from Permits)

- | | | | | |
|------|--|---|---|---|
| f. | Does the owner or operator maintain an inspection
log or summary of owner or operator inspections?
40 CFR 265.15(d) (320 IAC 4.1-16-6) | — | ✓ | — |
| g. | Does the inspection log contain the following information:
40 CFR 265.15(d) (320 IAC 4.1-16-6) | | | |
| i. | the date and time of the inspection? | — | — | — |
| ii. | the name of the inspector? | — | — | — |
| iii. | a notation of the observations made? | — | — | — |
| iv. | the date and nature of any repairs or remedial
actions? | — | — | — |

YES NO NI

4) Do personnel training records include:

- | | | | | |
|----|---|----------|----------|---|
| a. | Job titles for the positions related to HWM
<u>40 CFR 265.16(d)1 (320 IAC 4.1-16-7)</u> | <u>✓</u> | — | — |
| b. | The name of the employees filling each job title?
<u>40 CFR 265.16(d)(1) (320 IAC 4.1-16-7)</u> | <u>✓</u> | — | — |
| c. | Job descriptions including the required skills,
education, or other qualifications and the duties
of the personnel assigned to the position?
<u>40 CFR 265.16(d)2 (320 IAC 4.1-16-7)</u> | <u>✓</u> | — | — |
| d. | Description of both introductory and continuing
training required for each job?
<u>40CFR 265.16(d)(3) (320 IAC 4.1-16-7)</u> | — | <u>✓</u> | — |
| e. | Records of training required in (d)?
<u>40 CFR 265.16(d)4 (320 IAC 4.1-16-7)</u> | <u>✓</u> | — | — |
| f. | Did facility personnel receive the required training including: | | | |
| | i) classroom or on the job | <u>✓</u> | — | — |
| | ii) within 6 months of hire | <u>✓</u> | — | — |
| | iii) annual review of training? | <u>✓</u> | — | — |
| g. | Are <u>all</u> training records maintained for current
personnel and for at least three years for former
employees?
<u>40 CFR 265.16(e) [320 IAC 4.1-16-7(e)]</u> | <u>✓</u> | — | — |

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

1) Does the Contingency Plan contain the following information:

- a. The actions facility personnel must take to comply with 265.51 (4.1-18-2) and 265.56 (4.1-18-7) in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable). ✓ 1 — —
- b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to 265.37 (4.1-17-7)? ✓ — — —
- c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators? ✓ — — —
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? ✓ — — —
40 CFR 265.52(e) (320 IAC 4.1-18-3)
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) ✓ — — —
40 CFR 265.52(f) (320 IAC 4.1-18-3)

2) Emergency Coordinator:

- a. Is the facility Emergency Coordinator identified? ✓ — — —
40 CFR 265.52(d) (320 IAC 4.1-18-3)
- b. Is coordinator familiar with all aspects of site operation and emergency procedures? ✓ — — —
40 CFR 265.55 (320 IAC 4.1-18-6)
- c. Does Emergency Coordinator have the authority to carry out the Contingency Plan? ✓ — — —
40 CFR 265.55 (320 IAC 4.1-18-6)

Copy on file @ DEM see previous inspection and correspondence

Preparedness and Prevention

YES NO NI

- 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?
40 CFR 265.37 (320 IAC 4.1-17-7)

✓

- 2) Are copies of the Contingency Plan available at the site and local emergency organizations?
40 CFR 265.53 (320 IAC 4.1-18-4)

✓

- 3) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (320 IAC 4.1-18-7)?

____ ✓

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

- 4) Use of Manifest System:

a. Does the facility follow the procedures listed in 265.71 (4.1-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

____ ✓

b. Are records of past shipments retained for 3 years?
40 CFR 265.71(b)5 (320 IAC 4.1-19-2)

- 5) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only)
40 CFR 265.72 (320 IAC 4.1-19-3)

① Does not receive waste from off site other than characteristic waste standard which does not need manifests.

3) Operating Record:

	<u>YES</u>	<u>NO</u>	<u>NI</u>
a. Does owner or operator have a operating record? <u>40 CFR 265.73(a)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
b. Does the owner or operator maintain an operating record that contains the following information?			
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I (320 IAC 4.1-32-2)? <u>40 CFR 265.73(b)(1) (320 IAC 4.1-19-4)</u>	<u>—</u>	<u>✓</u>	<u>—</u>
ii. The location and quantity of each hazardous waste within the facility? (This information shall be cross referenced to a specific manifest number if the waste was accompanied by manifest.) <u>40 CFR 265.73(b)(2) (320 IAC 4.1-19-4)</u>	<u>—</u>	<u>✓</u>	<u>—</u>
iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) <u>40 CFR 265.73(b)(2) (320 IAC 4.1-19-4)</u>	<u>—</u>	<u>N/A</u>	<u>—</u>
iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? <u>40 CFR 265.73(b)(3)(5)(6) (320 IAC 4.1-19-4)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
v. Reports detailing all incidents that required implementation of the Contingency Plan? <u>40 CFR 265.73(b)(4) (320 IAC 4.1-19-4)</u>	<u>—</u>	<u>—</u>	<u>✓</u>
vi. All closure and post closure costs as applicable? <u>40 CFR 265.73(b)(7) (320 IAC 4.1-19-4)</u>	<u>✓</u>	<u>—</u>	<u>—</u>

YES NO NI

4) Unmanifested Waste Reports:
(applies only to Off-site facilities)

- a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (4.1-8-1) without a manifest or shipping paper?
40 CFR 265.76 (320 IAC 4.1-19-7) ✓
- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.
- c. Has the facility submitted 8700-13B (unmanifested waste report)?
-
-
-

6) Closure/Post-Closure:

- a. Is the closure plan available for inspection?
40 CFR 265.112(a) (320 IAC 4.1-21-3) ✓
- b. Is the post-closure plan available for inspection?
(for disposal facilities only)
40 CFR 265.118(a) (320 IAC 4.1-21-8)
-
-
-

PHYSICAL FACILITY INSPECTION

- 1) Security - Do security measures include:
(If applicable)

See 40 CFR 265.14 (320 IAC 4.1-16-5) for the following

	<u>YES</u>	<u>NO</u>	<u>NI</u>
a. 24- hour surveillance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
or			
b. i. Artificial or natural barrier around facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Controlled entry?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Danger sign(s) at entrance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Preparedness and Prevention:

Part 265 Subpart C

- 2) Maintenance and Operation of Facility

a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?
40 CFR 265.31 (320 IAC 4.1-17-2) ☒ ☐ ☐

- 3) If required, does the facility have the following equipment:

a. Internal communications or alarm systems?
40 CFR 265.32(a) & 40 CFR 265.34(a) (320 IAC 4.1-17-3 & 5) ☒ ☐ ☐

b. Telephone or 2-way radios at the scene of operations?
40 CFR 265.32(b) & 40 CFR 265.34(b) (320 IAC 4.1-17-3 & 5) ☒ ☐ ☐

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?
40 CFR 265.32(c) [320 IAC 4.1-17-3(c)] ☒ ☐ ☐

d. Are water hoses, foam equipment, automatic sprinklers or water spray equipment available?
40 CFR 265.32(d) [320 IAC 4.1-17-3(d)] ☒ ☐ ☐

① Small over flow of dike on Oliver storage tank. Mr. Laque indicated the tank had been over filled

3) Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
40 CFR 265.33 (320 IAC 4.1-17-4)

✓

b. Is emergency equipment maintained in operable condition?
40 CFR 265.33 (320 IAC 4.1-17-4)

✓

4) Has owner or operator provided immediate access to internal alarms?
 (If needed)

40 CFR 265.34(a) (320 IAC 4.1-17-5)

✓

5) Does the owner or operator maintain adequate aisle space for inspections, movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)

40 CFR 265.35 (320 IAC 4.1-17-6)

✓

① Waste oil sludge mixed with water

Use and Management of Containers

40 CFR 265 Subpart I

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Are containers in good condition? <u>40 CFR 265.170 (320 IAC 4.1-23-1)</u>	—	—	—
2) Are containers compatible with waste in them? <u>40 CFR 265.172 (320 IAC 4.1-23-3)</u>	—	—	—
3) Are containers managed to prevent leaks? <u>40 CFR 265.173(b) (320 IAC 4.1-23-4)</u>	—	—	—
4) Are containers stored closed? <u>40 CFR 265.173(d) (320 IAC 4.1-23-4)</u>	—	—	—
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). <u>40 CFR 265.176 (320 IAC 4.1-23-6)</u>	—	—	—
6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) <u>40 CFR 265.177(a) (320 IAC 4.1-23-7)</u>	—	—	—
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? <u>40 CFR 265.177(c) (320 IAC 4.1-23-7)</u>	—	—	—
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a) (320 IAC 4.1-16-8)</u>			
a. Special handling?	—	—	—
b. No Smoking signs?	—	—	—
c. Separation and protection from ignition sources?	—	—	—
9) Does the container storage area have adequate aisle space so that containers can be inspected for leaks or deterioration without moving the containers during the inspection (about 2.5 feet)? <u>320 IAC 4.1-23-4(c)</u>	—	—	—

None on site

Tanks

40 CFR 265 Subpart J

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|--|------------|-----------|-----------|
| 1) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?
<u>40 CFR 265.192(b) (320 IAC 4.1-24-2)</u> | ✓ | — | — |
| 2) Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?
<u>40 CFR 265.192(c) (320 IAC 4.1-24-2)</u> | — | — | N/A |
| 3) Do continuous feed systems have a waste-feed cut-off?
<u>40 CFR 265.192(d) (320 IAC 4.1-24-2)</u> | — | — | N/A |
| 4) Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable?
Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
<u>40 CFR 265.198 (320 IAC 4.1-24-6)</u> | — | — | N/A |
| 5) Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?
<u>40 CFR 265.198(b) (320 IAC 4.1-24-6)</u> | | | |

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code -1977" to determine compliance.)

- 6) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
40 CFR 265.17(a) (320 IAC 4.1-16-8)

- | | | | |
|---|---|---|---|
| a. Special handling? | — | — | — |
| b. No Smoking signs? | — | — | — |
| c. Separation and protection from ignition sources? | — | — | — |

Surface Impoundments

40 CFR 265, Subpart K

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Do surface impoundments have at least 60 cm (2 feet) or freeboard? <u>40 CFR 265.222 (320 IAC 4.1-25-2)</u>			<u>Not Measured</u> ①
2) Do earthen dikes have protective covers? <u>40 CFR 265.223 (320 IAC 4.1-25-3)</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<u>3/7/86</u>
3) Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) <u>40 CFR 265.229 (320 IAC 4.1-25-7)</u>			<u>N/A</u>
4) Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) <u>40 CFR 265.230 (320 IAC 4.1-25-8)</u>			<u>N/A</u>
5) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a) (320 IAC 4.1-16-8)</u>			
a. Special handling?			<u>✓</u>
b. No Smoking signs?			<u>✓</u>
c. Separation and protection from ignition sources?			<u>✓</u>

① Appeared to have sufficient freeboard

② Dikes have grass cover

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|--|------------|-----------|-----------|
| 1) Has the owner or operator of the facility implemented a groundwater monitoring system?
<u>40 CFR 265.90(a) (320 IAC 4.1-20-1)</u> | — | — ✓ — | — |
| 2) Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in <u>265.90(d) (320 IAC 4.1-20-1)?</u> | — | — | — |

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

	<u>YES</u>	<u>NO</u>	<u>NI</u>
<u>Manifest Requirements:</u>			
1) Does the operator have copies of the manifest available for review? 40 CFR 262.40 (320 IAC 4.1-10-1)	✓		
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period			<u>12</u>
3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 40 CFR 262.21 (320 IAC 4.1-8-1)			
a. Manifest document number? (A sequential number for all manifests before September 20, 1984 and a five digit unique number after September 20, 1984.)		✓ ^①	
b. Name, mailing address, telephone number, and EPA ID number of generator?		✓ ^②	
c. Name, telephone number (4.1-14-3) and EPA ID Number of Transporter(s)?	✓		
d. Name, Address, telephone number (4.1-14-3) and EPA ID Number of designated permitted facility?	✓		
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓		
f. The total quantity of waste(s) and the type and number of containers loaded?	✓		
g. Required certification?	✓		
h. Required signatures?	✓		
i. EPA hazardous waste number (4.1-14-3)?	✓ ^③		

- ① Safety Kleen Manifests are using 10 digit #'s
- ② Since 9/23/85 ~ 13 Safety Kleen Manifests don't have ID #
- ④ 6/12/85 # 00009 - No TSD signature (Adams Ctr.)
10/8/85 # 1352517267 - No TSD sig. (Safety Kleen)

YES NO NI

4) Reportable exceptions:

40 CFR 262.42 (320 IAC 4.1-10-3)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. (2) see comment 4 on previous page

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (320 IAC 4.1-10-3) to the Regional Administrator.

0

5) If required, are placards available to transporters of hazardous waste? N/A

40 CFR 262.33 (320 IAC 4.1-9-4)

INTERNATIONAL SHIPMENTS:

1) Has the installation imported or exported hazardous waste? ✓

40 CFR 262.50 (320 IAC 4.1-11-1)

(If answered Yes, complete the following as applicable.)

a. ~~Exporting~~ hazardous waste; has a generator:

i. Notified the administrator in writing? _____

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? _____

iii. Met the Manifest requirements? _____

b. Importing hazardous waste; has the generator met the manifest requirements? _____

PRE-TRANSPORT REQUIREMENTS:

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|--|------------|-----------|-----------|
| 1) Is waste packaged in accordance with DOT regulations?
(required prior to movement of hazardous waste off-site)
<u>40 CFR 262.30 (320 IAC 4.1-9-1)</u> | — | — | — |
| 2) Are waste packages marked and labeled in accordance with
DOT regulations concerning hazardous waste materials?
(Required for movement of hazardous waste off-site)
<u>40 CFR 262.31-261.32 (320 IAC 4.1-9-2 & 3)</u> | — | — | — |
| <hr/> | | | |
| <hr/> | | | |
| <hr/> | | | |

3) On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b) (320 IAC 4.1-15-1)] or (B) in accordance with 40 CFR 262.34 (320 IAC 4.1-9-5) [see 265.1(c)(7) (320 IAC 4.1-15-1)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this blank and skip to RECORDKEEPING AND REPORTING. If the installation elects option B, complete the following observations:

- | | | | |
|--|---|---|---|
| a. Is the container clearly marked with the start of
accumulation date?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | ✓ |
| b. Are <u>all</u> containers visible for inspection?
<u>40 CFR 262.34(a)(2) (320 IAC 4.1-9-5)</u> | — | — | — |
| c. Have more than 90 days elapsed since the date
inspected in (a)?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
| d. Do wastes remain in accumulation tanks for more than
90 days?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | — |
| e. Is each container and tank labeled or marked clearly
with the words "Hazardous Waste"?
<u>40 CFR 262.34 (320 IAC 4.1-9-5)</u> | — | — | ↓ |
| <hr/> | | | |
| <hr/> | | | |
| <hr/> | | | |
| <hr/> | | | |

YES NO NI

RECORDKEEPING AND REPORTING:

- | | | | |
|--|----------|-----------|-----------|
| 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility?
<u>40 CFR 262.11 (320 IAC 4.1-7-2)</u> | <u>✓</u> | <u> </u> | <u> </u> |
| 2) Have <u>all</u> all test results and analyses needed for hazardous waste determination been done? Are they retained on-site for at least three years?
<u>40 CFR 262.11 (4.1-7-2) & 40 CFR 262.40 (4.1-7-2)</u> | <u>✓</u> | <u> </u> | <u> </u> |
| 3) Has the generator submitted biennial reports and exception reports as required?
<u>320 IAC 4.1-10-2 and 320 IAC 4.1-10-3</u> | <u>✗</u> | <u>✓</u> | <u>①</u> |
| 4) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
<u>40 CFR 262.40 (320 IAC 4.1-10-1)</u> | <u>✓</u> | <u> </u> | <u> </u> |

① See page 19 ; Comment 4

APPENDIX TR

<u>SCOPE:</u>	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Complete this Appendix if the owner or operator transports hazardous waste subject to <u>40 CFR 263.10 (320 IAC 4.1-10-1)</u>	___	___	___
2) Does the transporter transport hazardous waste into the U.S. from abroad?	___	___	___
3) Does the transporter transport hazardous waste out from the U.S.?	___	___	___
4) Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___

MANIFEST SYSTEM AND RECORDKEEPING:

1) Are copies of completed manifests available for review and retained for three years? <u>40 CFR 263.22 (320 IAC 4.1-13-3)</u>	___	___	___
2) Estimate the number of manifests for shipments completed during the past 6 months.	___	___	___
3) Examine a representative number of manifests. Indicate number examined.	___	___	___
4) Did the transporter properly sign and date the manifests examined? <u>40 CFR 263.20 (320 IAC 4.1-13-1)</u>	___	___	___
5) Do any manifests indicate shipments delivered to other than the designated facility? (If (5) is "NO", skip 6 and 7.)	___	___	___
6) Do any manifests indicate shipments delivered to other than an alternate facility?	___	___	___
7) Are shipments delivered to alternate facilities <u>only</u> because emergency prevents delivery to the designated facility? <u>40 CFR 263.21 (320 IAC 4.1-13-2)</u>	___	___	___
	___	___	___
	___	___	___
	___	___	___

DRAW A SITE MAP; identify () of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

See Part A

Remember to take photos and document as well as possible all violations!!!

TSD RCRA Inspection Report

EPA Identification Number: 1 N D 0 0 6 4 1 7 4 3 0

Installation Name: Rock Island Refining Corp.

Location Address: 5000 West 86th St.

City: Indpls.

ZIP _____

Date of Inspection: 1/29 & 30/85 Time of Inspection _____

Person(s) interviewed *

Title

Telephone

William Hague

Envir. Coord.

317/812-3200

Inspector(s)

Agency

Telephone

David J. Koeppe

ISOH

243-5107

* Please identify correspondence contact William Hague

Installation Processes by Process Code (EPA Form 3510-3)

- S01 ☒ Container (barrel, drum, etc.)
- S02 ☒ Tanks
- S04 ☐ Surface impoundment
- D84 ☐ Surface impoundment closed as a landfill
- S03 ☐ Waste Pile
- D81 ☐ Landfill
- D80 ☐ Underground injection

If Part A process codes are not listed above please check 40 CFR 265 Appendix I, Table 2 for correct code number. List codes below.

T01, D81, T04 (Vacuum Filter may be exempt) T03 - Incinerator

Other activities ttob

Generator ☒

Appendix GN

Transporter ☐

Appendix TR

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

D81 - Non-haz. waste T03, T04

T03 - Air pollution control - tail gas (non-haz.) incinerator - not regulated under RCRA

T01 - Water Pollution Control Unit

T04 - reclamation device - sends liquid to

back into storage process tanks.

1. Verify EPA I.D. No. ok

2. Type of Facility (G, T, TSD) based on inspection

3. Type of Operation, Products Manufactured, Processes Utilized,
Size of Operation. Concentrate on processes that produce waste
(hazardous or non-hazardous)!

Refinery generates wastes below. Any cleaning ~~the~~ solvents or
lab wastes go to API separator. All K049 K050 go
to API separator, sludge from API goes to (pumped)
a hopper and taken to vacuum filter. Any other
liquid wastes such as solvents or what ever (except normal
trash) go into sewer and then to API separator.

4. Hazardous Waste
Streams/EPA #

<u>Streams/EPA #</u>	<u>Source</u>	<u>Rate</u>	<u>Disposition</u>
K049	Slop oil		
K050 ^{Heat exchanger bundle sludge}	Combined	89 cu.yd/mo.	Adams Ctr. CR
K051 API Separator			
Leaded Tank Bottoms	Tanks	NON-PERIODIC	LF
Cooling Tower Sludge	Cooling tower	"	LF

5. Exempted/Excluded Hazardous Waste Streams and Reason for Exemption

6. Hazardous Waste On-Site

Amount

How Stored

Comments

API Separator Sludge

2.

Tank

Vacuum filter Sludge

2/3

Hopper (9th)

7. Is the Annual Report Accurate? I believe it is

8. Non-Hazardous Waste Streams

Source

Rate

Disposition

Trash

Can the Company Document Questionable Waste Streams are Non-Hazardous as Claimed?

9. Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.)

Numerous areas where some oil spillage has occurred.

General Facility Standards (paperwork)

YES NO NI

1) Has the Regional Administrator/Environmental Management Board been notified regarding:

- | | | | | |
|----|---|---|-----|-----|
| a. | Receipt of hazardous waste from a foreign source?
40 CFR 265.12(a) | — | ✓ | N/A |
| b. | Facility expansion?
40 CFR 122.23(c) | — | N/A | — |
| c. | Change of owner or operator?
40 CFR 265.12(b) | — | N/A | — |

2) General Waste Analysis:

- | | | | | |
|----|---|---|---|---|
| a. | Has the owner or operator obtained a detailed chemical and physical analysis of the waste?
40 CFR 265.13(a)1 | ✓ | — | — |
| b. | Does the owner or operator have a detailed waste analysis plan on file at the facility?
40 CFR 265.13(b) | ✓ | — | — |

Does the waste analysis plan contain:

- | | | | | |
|------|--|---|---|----|
| 1. * | parameters lead, chrome | ✓ | ✓ | — |
| 2. * | test methods | ✓ | — | — |
| 3. | sampling method for representative sample | ✓ | — | — |
| 4. * | frequency of analysis yearly or as needed | ✓ | — | — |
| 5. | off-site only: waste analysis from generators | — | — | NA |
| 6. | Where applicable (additional waste analysis needed) | — | — | — |
| a. | 265.193 When chemically or treating different waste or using a different process or storing waste in different type of containers. | — | — | — |
| b. | 265.225 Surface impoundment
(same as above) | — | — | — |
| c. | 265.252 Waste Pile
(same as above) | — | — | — |
| d. | 265.273 Land Treatment Facility
(same as above) | — | — | — |
| e. | 265.341 Incinerators
(same as above) | — | — | — |
| f. | 265.375 Thermal Treatment
(same as above) | — | — | — |
| g. | 265.402 Chemical, Physical, Biological Treatment
(same as above) | — | — | — |

* done when processes change

* cyanide on 1981-82 analyses fluctuates from 11 ug/gr to 30 ug/gr. (should be required on all new tests)
cyanide produced by cracker

YES NO NI

- c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

40 CFR 265.13(c)

N/A

3) Owner or Operator Inspections:

- a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?

40 CFR 265.15(a)

✓

- b. Does the owner or operator have an inspection schedule at the facility?

40 CFR 265.15(b)2

✓

- c. If storage in tanks or containers is used does the inspection schedule require a weekly inspection?

40 CFR 265.194 tanks, 265.174 containers, 265.226(a)2 impoundments

✓

A daily

	<u>YES</u>	<u>NO</u>	<u>NI</u>
d. If so, does the schedule address the inspection of the following items: <u>40 CFR 265.15(b)1</u>			
i. monitoring equipment?	<u>✓</u>	<u>—</u>	<u>—</u>
ii. safety and emergency equipment?	<u>✓</u>	<u>—</u>	<u>—</u>
iii. security devices (including fences)?	<u>✓</u>	<u>—</u>	<u>—</u>
iv. operating and structural equipment (ie. dikes, pumps, etc.)?	<u>✓</u>	<u>—</u>	<u>—</u>
v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? <u>40 CFR 265.15(b)(2)</u>	<u>✓</u>	<u>—</u>	<u>—</u>
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? <u>40 CFR 265.15(b)(4)</u>	<u>✓</u>	<u>✗</u>	<u>—</u>
vii. <u>Must include:</u>			
1. Weekly container storage? <u>265.174</u>	<u>✓</u>	<u>—</u>	<u>—</u>
2. Daily and Weekly Tank Storage? <u>265.194</u>	<u>✓</u>	<u>—</u>	<u>—</u>
3. Daily freeboard and weekly dike inspection for surface impoundments? <u>265.226</u>	<u>—</u>	<u>N/A</u>	<u>—</u>
4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) <u>265.15(b)(4)</u>	<u>—</u>	<u>N/A</u>	<u>—</u>
e. Are areas subject to spills inspected (scheduled) daily when in use? <u>265.15(b)(4)</u>	<u>✓</u>	<u>—</u>	<u>—</u>

* daily for everything

- | | YES | NO | NI |
|---|-----|----|----|
| f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?
40 CFR 265.15(d) | — | ✓* | — |
| g. Does the inspection log contain the following information:
40 CFR 265.15(d) | | | |
| i. the date and time of the inspection? | — | ✓ | — |
| ii. the name of the inspector? | — | ✓ | — |
| iii. a notation of the observations made? | — | ✓ | — |
| iv. the date and nature of any repairs or remedial actions? | — | ✓ | — |

* only NPDES required logs and preventative maintenance (work orders are recorded w/ time sheets for repairs) — filter ^{Vacuum} and storage area not included

4) Do personnel training records include:

- | | | | |
|---|-----|----|---|
| a. Are all facility personnel included in the records?
40 CFR 265.16(a)(1) | — | ✓ | — |
| b. Job titles?
40 CFR 265.16(d)1 | ✓ | ✓* | — |
| c. Job descriptions?
40 CFR 265.16(d)2 | ✓ | ✓* | — |
| d. Description of training?
40 CFR 265.16(d)3 | ✓** | — | — |
| e. Records of training?
40 CFR 265.16(d)4 | ✓ | — | — |
| f. Did facility personnel receive the required training including: | | | |
| i) classroom or on the job | — | ✓ | — |
| ii) within 6 months of hire | — | — | — |
| *** iii) annual review of training? | — | ✓ | — |

Jobs involved:
#2 Operator (trapman), Env. Coord., Area 4 Maint supervisor, Area I supervisor.

* only #2 operator is shown in records for 1982
Records available for fire response, safety training not specific to RCRA

** a few records were available from 1981-82

Preparedness and Prevention

YES NO NI

- 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

40 CFR 265.37

✓ — —

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

- 1) Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).

✓ — —

b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to 265.37?

✓ — —

c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?

✓ on-staff 24 hrs
a day - 365 days

- 2) Emergency Coordinator:

a. Is the facility Emergency Coordinator identified?
40 CFR 265.52(d)

✓ — —

b. Is coordinator familiar with all aspects of site operation and emergency procedures?
40 CFR 265.55

✓ — —

c. Does Emergency Coordinator have the authority to carry out the Contingency Plan?
40 CFR 265.55

✓ — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
40 CFR 265.52(e)

✓ — —

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)
40 CFR 265.52(f)

✓* — —

* Rock Island employees may not evacuate but must respond to emergency

	<u>YES</u>	<u>NO</u>	<u>NI</u>
3) Are copies of the Contingency Plan available at the site and local emergency organizations? <u>40 CFR 265.53</u>	<u>✓</u>	<u> </u>	<u> </u>

4) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

<u>✓</u>	<u>N/A</u>	<u>to haz. Waste</u>
----------	------------	----------------------

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

1) Use of Manifest System:

a. Does the facility follow the procedures listed in 265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

<u> </u>	<u>N/A</u>	<u> </u>
-----------	------------	-----------

b. Are records of past shipments retained for 3 years?
40 CFR 265.71(b)5

<u> </u>	<u> </u>	<u> </u>
-----------	-----------	-----------

2) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only)
40 CFR 265.73(a)

<u> </u>	<u> </u>	<u> </u>
-----------	-----------	-----------

3) Operating Record:

YES NO NI

a. Does the owner or operator maintain an operating record as required in 265.73?

— ☒ —

b. Does the operating record contain the following information:

i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I?

40 CFR 265.73(b)(1)

— — —

ii. The location and quantity of each hazardous waste within the facility? (This information should be cross referenced to specific manifest number if the waste was accompanied by manifest.)

40 CFR 265.73(b)(2)

— — —

iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.)

40 CFR 265.73(b)(2)

— — —

iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections?

40 CFR 265.73(b)(3)(5)(6)

— — —

v. Reports detailing all incidents that required implementation of the Contingency Plan?

40 CFR 265.73(b)(4)

— — —

vi. All closure and post closure costs as applicable?

40 CFR 265.73(b)(7)

— — —

Only area where applicable is vacuum
filter area and tank (for storage of API sep. sludge
when pumped out of API separator)

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|---|------------|------------|-----------|
| 4) Availability of Records: | | | |
| Are all facility records required under 40 CFR 265 available for inspection? | | | |
| <u>40 CFR 265.74</u> | | | |
| 5) Unmanifested Waste Reports: | | | |
| (applies only to Off-site facilities) | | | |
| a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper? | | <u>N/A</u> | |
| <u>40 CFR 265.76</u> | | | |
| b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment. | | | |
| c. Has the facility submitted 8700-13B (unmanifested waste report)? | | | |

- | | | | |
|---|----------|------------|--|
| 6) Closure/Post-Closure: | | | |
| a. Is the closure plan available for inspection? | <u>✓</u> | | |
| <u>40 CFR 265.112(a)</u> | | | |
| b. Is the post-closure plan available for inspection? (for disposal facilities only) | | <u>N/A</u> | |
| <u>40 CFR 265.118(a)</u> | | | |
| c. Have copies of the closure/post-closure plans been submitted as a part of State Part A permit application? | | <u>✓</u> | |

PHYSICAL FACILITY INSPECTION

- 1) Security - Do security measures include:
(If applicable)

See 40 CFR 265.14 for the following

	<u>YES</u>	<u>NO</u>	<u>NI</u>
a. 24- hour surveillance?	<u>✓</u>	<u> </u>	<u> </u>
or			
b. i. Artificial or natural barrier around facility?	<u>✓</u>	<u> </u>	<u> </u>
and	<u>✓</u>	<u> </u>	<u> </u>
ii. Controlled entry?	<u>✓</u>	<u> </u>	<u> </u>
c. Danger sign(s) at entrance?	<u>✓</u>	<u> </u>	<u> </u>

Preparedness and Prevention:

Part 265 Subpart C

- 1) Maintenance and Operation of Facility

a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? <u>40 CFR 265.31</u>	<u> </u>	<u>✓</u>	<u> </u>
--	-----------	----------	-----------

- 2) If required, does the facility have the following equipment:

a. Internal communications or alarm systems? <u>40 CFR 265.34(a) & 40 CFR 265.32(a)</u>	<u>✓</u>	<u> </u>	<u> </u>
b. Telephone or 2-way radios at the scene of operations? <u>40 CFR 265.32(b) & 40 CFR 265.34(b)</u>	<u>✓</u>	<u> </u>	<u> </u>
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? <u>40 CFR 265.32(c)</u>	<u>✓</u>	<u> </u>	<u> </u>

Indicate the volume of water and/or foam available for fire control:

YES NO NI

3) Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
40 CFR 265.33

✓ — —

b. Is emergency equipment maintained in operable condition?
40 CFR 265.33

✓ — —

4) Has owner or operator provided immediate access to internal alarms?
(If needed)
40 CFR 265.34(a)

— — ✓

5) Does the owner or operator maintain adequate aisle space for movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)
40 CFR 265.35

N/A (only one Tank)

Use and Management of Containers

40 CFR 265 Subpart I

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Are containers in good condition? <u>40 CFR 265.170</u>	___	___	___
2) Are containers compatible with waste in them? <u>40 CFR 265.172</u>	___	___	___
3) Are containers managed to prevent leaks? <u>40 CFR 265.173(b)</u>	___	___	___
4) Are containers stored closed? <u>40 CFR 265.173(d)</u>	___	___	___
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). <u>40 CFR 265.176</u>	___	___	___
6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) <u>40 CFR 265.177(a)</u>	___	___	___
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? <u>40 CFR 265.177(c)</u>	___	___	___
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a)</u>			
a. Special handling?	___	___	___
b. No Smoking signs?	___	___	___
c. Separation and protection from ignition sources?	___	___	___
9) Is there adequate aisle space for unobstructed movement? <u>40 CFR 265.35</u>	___	___	___
	___	___	___
	___	___	___
	___	___	___

Tanks

40 CFR 265 Subpart J

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|--|------------|------------|-----------|
| 1) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?
40 CFR 265.192(b) | <u>✓</u> | <u>—</u> | <u>—</u> |
| 2) Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?
40 CFR 265.192(c) | <u>—</u> | <u>N/A</u> | <u>—</u> |
| 3) Do continuous feed systems have a waste-feed cut-off?
40 CFR 265.192(d) | <u>—</u> | <u>—</u> | <u>✓</u> |
| 4) Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable?
Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
40 CFR 265.198 | <u>—</u> | <u>N/A</u> | <u>—</u> |
| 5) Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?
40 CFR 265.198(b) | <u>—</u> | <u>—</u> | <u>—</u> |

Tank capacity: NI gallons

Tank diameter: NI feet

Distance of tank from property line N/A > 50 feet

(See table 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code -1977" to determine compliance.)

- 6) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?
40 CFR 265.17(a)

- | | | |
|---|----------|------------|
| a. Special handling? | <u>✓</u> | <u>N/A</u> |
| b. No Smoking signs? | <u>✓</u> | <u>"</u> |
| c. Separation and protection from ignition sources? | <u>✓</u> | <u>"</u> |

Surface Impoundments

40 CFR 265, Subpart K

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Do surface impoundments have at least 60 cm (2 feet) or freeboard? <u>40 CFR 265.222</u>	_____	_____	_____
2) Do earthen dikes have protective covers? <u>40 CFR 265.223</u>	_____	_____	_____
3) Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) <u>40 CFR 265.229</u>	_____	_____	_____
4) Are incompatible wastes stored in difference impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) <u>40 CFR 265.230</u>	_____	_____	_____
5) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a)</u>			
a. Special handling?	_____	_____	_____
b. No Smoking signs?	_____	_____	_____
c. Separation and protection from ignition sources?	_____	_____	_____

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|--|------------|-----------|-----------|
| 1) Has the owner or operator of the facility implemented a groundwater monitoring system?
40 CFR 265.90(a) | _____ | _____ | _____ |
| 2) Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)? | _____ | _____ | _____ |

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

<u>Manifest Requirements:</u>	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Does the operator have copies of the manifest available for review? <u>40 CFR 262.40</u>	✓	—	—
2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period			11/11/11 ~ 6
3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). <u>40 CFR 262.21</u>			except for period where waste went to Danville SLE w/o manifest
a. Manifest document number?	✓	—	—
b. Name, mailing address, telephone number, and EPA ID number of generator?	✓	—	—
c. Name and EPA ID Number of Transporter(s)?	✓	—	—
d. Name, Address, and EPA ID Number of designated permitted facility?	✓	—	—
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	✓	—	—
f. The total quantity of waste(s) and the type and number of containers loaded?	✓	—	—
g. Required certification?	✓	—	—
h. Required signatures?	✓	—	—

YES NO NI

4) Reportable exceptions:

40 CFR 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. 1 *

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. 0 *

5) If required, are placards available to transporters of hazardous waste?

40 CFR 262.33

N/A ☒

* 2/28/83 to Northside SLE # 99, no TSD signed copy was found

INTERNATIONAL SHIPMENTS:

1) Has the installation imported or exported hazardous waste? ✓

40 CFR 262.50

(If answered Yes, complete the following as applicable.)

a. Exporting hazardous waste; has a generator:

i. Notified the administrator in writing?

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

iii. Met the Manifest requirements?

b. Importing hazardous waste; has the generator met the manifest requirements?

PRE-TRANSPORT REQUIREMENTS:

YES NO NI

- 1) Is waste packaged in accordance with DOT regulations?
(required prior to movement of hazardous waste off-site)
40 CFR 262.30

N/A

- 2) Are waste packages marked and labeled in accordance with
DOT regulations concerning hazardous waste materials?
(Required for movement of hazardous waste off-site)
40 CFR 262.31-261.32

- 3) On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this blank and skip to RECORDKEEPING AND REPORTING. If the installation elects option B, complete the following observations:

- a. Is the container clearly marked with the start of
accumulation date?
40 CFR 262.34

- b. Are all containers visible for inspection?
40 CFR 262.34(a)(2)

- c. Have more than 90 days elapsed since the date
inspected in (a)?
40 CFR 262.34

NOT LABELLED

- d. Do wastes remain in accumulation tanks for more than
90 days?
40 CFR 262.34

N/A

- e. Is each container and tank labeled or marked clearly
with the words "Hazardous Waste"?
40 CFR 262.34

Violation if we decide
it is "3."

* One hopper is on-site for vacuum filter
sludge - not dated or marked - sits
under filter so it may not need to be as it
is part of the system (unless it is moved
out)

RECORDKEEPING AND REPORTING:

- 1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
40 CFR 262.40

✓
_ _ _

7

APPENDIX TR

SCOPE:

YES NO NI

- | | | | |
|---|-------|-------|-------|
| 1) Complete this Appendix if the owner or operator transports hazardous waste subject to <u>40 CFR 263.10</u> | _____ | _____ | _____ |
| 2) Does the transporter transport hazardous waste into the U.S. from abroad? | _____ | _____ | _____ |
| 3) Does the transporter transport hazardous waste out from the U.S.? | _____ | _____ | _____ |
| 4) Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? | _____ | _____ | _____ |

MANIFEST SYSTEM AND RECORDKEEPING:

- | | | | |
|--|-------|-------|-------|
| 1) Are copies of completed manifests available for review and retained for three years?
<u>40 CFR 263.22</u> | _____ | _____ | _____ |
| 2) Estimate the number of manifests for shipments completed during the past 6 months. | _____ | _____ | _____ |
| 3) Examine a representative number of manifests. Indicate number examined. | _____ | _____ | _____ |
| 4) Did the transporter properly sign and date the manifests examined?
<u>40 CFR 263.20</u> | _____ | _____ | _____ |
| 5) Do any manifests indicate shipments delivered to other than the designated facility?

(If (5) is "NO", skip 6 and 7.) | _____ | _____ | _____ |
| 6) Do any manifests indicate shipments delivered to other than an alternate facility? | _____ | _____ | _____ |
| 7) Are shipments delivered to alternate facilities <u>only</u> because emergency prevents delivery to the designated facility?
<u>40 CFR 263.21</u> | _____ | _____ | _____ |
-
-
-
-

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

See Part A

Remember to take photos and document as well as possible all violations!!!

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

Comments

- 1) Rock Island uses 6 aeration lagoons for pretreatment of their Process/API separator wastewater before discharge to the POTW.
- 2) Rock Island land applied some basic sedimentation sludges on their property with the knowledge and approval of the ISBH Land and Water Divisions. The waste in the basic sedimentation ponds consisted of the "rag" layer of the API separator which was usually disposed of until oil prices increased. This waste would have probably been listed as hazardous except for the fact that it was produced prior to RCRA. It was tested by Rock Island and found to be nonhazardous for subpart C characteristics.
- 3) The hydrofluoric acid catalyst is used in the alkylation of olefins (propylenes, butylenes, pentenes). The acid is regenerated in process. Any residues or spills are neutralized with massive quantities of lime. No indication was given for disposal of acids other than spills.
- 4) K049 and K050 wastes go into the API separator, via the sewer system, and are mixed with that sludge when it is disposed.
- 5) Cooling tower sludge and leaded tank bottoms are produced on a nonperiodic basis and are disposed of as needed.
- 6) Lab wastes and maintenace wastes are dumped into plant sewers. It was stated that most of these were probably recycled back into the crude oil tanks or directly into the cracker unit from the API separator. These wastes may contain listed solvents.

9-Sep-85

Subject: Rock Island Refining Corporation

From: Roy A. Wogelius, Permit Reviewer

To: The New Permit Reviewer

I. Background

a. Type of facility and wastes.

Rock Island is a small, independent oil refinery located on the Wisconsinian till plain just outside of and to the northwest of Indianapolis. The facility produces typical oil refinery wastes; K049 - Strip Oil Emulsion Solids, K050 - Heat Exchange Bundle Cleaning Sludge, and K051 API Separator Sludge.

As I understand the facility, their primary waste stream resulting from refining is pumped to one of two API separators. Oil is recycled as it separates from the H_2O & solids. The watery portion of the waste is pumped out to 6 serial aeration lagoons. Sludges produced in the API and emulsion solids are stored in tanks or pits and then dewatered in a vacuum filter. Liquids from filtering go back to the API separator while

the filter cake is trucked off-site to a hazardous waste landfill. (K052-leaked tank bottoms, are produced here but are trucked off-site as soon as the tanks are cleaned, thus avoiding the need for permitting.) Incidentally, check §261.3(a)(2)(iv)(c) to see that the K050 waste at Rock Island is not regulated as long as they flush it into their sewers. If they ever start scraping this sludge off and TSD'ing it in concentrated form then it will become regulated. (Here comes the tricky part.)

A. API separator sludge exits the API separator along with stop oil/emulsion solids. These two listed wastes are produced from the separator. This is the point where regulation begins.

B. Thus, the sludge holding tanks and suction pits which store K051 and K049 are regulated as P02.

C. Listed wastes are then dewatered in the vacuum filter (which is T04). However, liquid resulting from this treatment is a hazardous waste (see §261.3(c)(2)) so, because this hazardous waste is pumped back to the API separator, the API separator is treating a

hazardous waste. This is also probably a T04 process code.

D. For the reason set out in C, all three streams produced from the API are hazardous. Therefore, the watery portion is a hazardous waste. Thus, the 6 aeration lagoons are treating hazardous waste and must be permitted. (As T02). The November 17, 1981 FR does not apply in this case. Similarly, the sludge that accumulates in these lagoons is regulated. It is the effluent from these lagoons that is regulated under NPDES. RCRA control ends at the outflow of these lagoons.

E. (Here comes the very tricky part). Rock Island has an "informal delisting" for their K049, K050, and K051 wastes. This informal delisting is meaningless. However, they think it exempts their old land treatment area and their old basin sediment & water ponds.

Region V's opinion is that since those units were used after Nov. 19, 1980, they are subject to regulation and must be properly closed. This adds D81 and more T02 capacity to their application. It seems that headquarters is going to

agree with this opinion.

b. Permitting History

Rock Island has interim status but is out of compliance with respect to groundwater monitoring for its surface impoundments and land application.

Their Part B has been checked for completeness by Region V and ISBH. The NOD has been responded too - however we are waiting for HQ to clarify the meaning of "internal delisting" before issuing a second NOD. The application as it stands now is intelligible but minimal. (The waste analysis plan is bad enough to deny the application on technical grounds.)

II. Current Issues

a. Upcoming Deadlines

They must comply with groundwater monitoring regulations by Nov. 8, 1985 on base interim status.

HQ must clarify "internal delistings" by ~ Oct. 1 in order for you to get Rock Island to believe they must comply.

b. Compliance Status - Dave Koeppe at ISBH

can tell you about Rock Island. According to him "everything goes down the sewer."

We want them in compliance ASAP.

c. Delistings - Their informal delisting was intended to apply only in a landfill scenario and only to the filter cake. Thus, everything listed above will remain regulated even if ^(final) delisting occurs. According to Barbara Bush at HQ, delisting isn't likely. In which case, denial is likely sometime in November.

Contacts: Cyndi Hall at ISBH on permits
1/86 No longer with EPA ~~Barbara Bush at HQ "delisting"~~
Dave Roepper at ISBH on compliance (inspections)

3/86 Doreen Sterling, HQ 475-6775

RECEIVED

OCT 01 1985

Contact: William Laque

22-3200

1B1

PRE-INSPECTION CHECKLIST

SOLID WASTE DIVISION
U.S. EPA, REGION V

DATE: _____

Company: Rock Island Refinery TSD G T
Location: _____
EPA ID Number: IND 006417430
Type of Industry: _____
Inspector(s): _____

	YES	NO
1. Federal Part A on File:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. State Part A on File:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Closure Plan Reviewed:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Contingency Plan Reviewed:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
5. Waste Analysis Plan Reviewed:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
6. Annual Report Reviewed:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7. Federal and State Part A Compared:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Note any differences. (Difference should be resolved during inspection.)

8. Date of Last Inspection: _____
9. Enforcement Action Taken in Past: _____
10. List Type of Action and Major Violations: _____

11. Approval Letters for Landfilling ALL Waste Reviewed. ☒
List Waste, Amount, and Landfill Approved:
Delisted? K050, K049, K051, sludges to Adams Ctr. 120 cu yds/month
Raw Water Cold Lime treatment sludge, Danville SCF - 30 ton/wk.
#6 Fuel Oil Tank Residue - Danville SCF - 850 cu. yds/once
12. NPDES Permit: ☒
13. Part A Allowed Quantity of Waste
So2 - 6000 gal

14. Part A Hazardous Waste Codes and Names:

15. List Possible Waste Streams Not Listed on Part A:

Revised
1/18/85

Annual Report

It appears that they have delisted their K049, K050, K051
sludge — they show no other wastes produced
or disposed

